

Richard A. Smith  
Elizabeth H. Zultoski  
SMITH & LOWNEY, PLLC  
2317 East John Street  
Seattle, Washington 98112  
(206) 860-2883

Attorneys for Plaintiff

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

|                             |   |           |
|-----------------------------|---|-----------|
| WASTE ACTION PROJECT,       | ) |           |
|                             | ) |           |
| Plaintiff,                  | ) |           |
| v.                          | ) | COMPLAINT |
|                             | ) |           |
| INTERNATIONAL PAPER CO. dba | ) |           |
| INTERNATIONAL PAPER         | ) |           |
| RECYCLING,                  | ) |           |
|                             | ) |           |
| Defendant.                  | ) |           |
|                             | ) |           |
|                             | ) |           |

**I. INTRODUCTION**

1. This action is a citizen suit brought under Section 505 of the Clean Water Act (“CWA”) as amended, 33 U.S.C. § 1365. Plaintiff Waste Action Project seeks a declaratory judgment, injunctive relief, the imposition of civil penalties, and the award of costs, including attorneys’ and expert witnesses’ fees, for defendant International Paper Co. dba International Paper Recycling’s repeated and ongoing violations of Sections 301(a) and 402 of the CWA, 33 U.S.C. §§ 1311(a) and 1342, and the terms and conditions of its National Pollutant Discharge

1 Elimination System (“NPDES”) permit authorizing discharges of pollutants from Defendant’s  
2 Kent, Washington, facility to navigable waters.

## 3 II. JURISDICTION AND VENUE

4 2. The Court has subject matter jurisdiction under Section 505(a) of the CWA, 33  
5 U.S.C. § 1365(a). The relief requested herein is authorized by 33 U.S.C. §§ 1319(d) and  
6 1365(a).  
7

8 3. Under Section 505(b)(1)(A) of the CWA, 33 U.S.C. § 1365(b)(1)(A), Plaintiff  
9 notified Defendant of Defendant’s violations of the CWA and of Plaintiff’s intent to sue under  
10 the CWA by letter dated April 2, 2014 and delivered April 3, 2014, and April 7, 2014 (“Notice  
11 Letter”). A copy of the Notice Letter is attached to this complaint as Exhibit 1. The allegations  
12 in the Notice Letter are incorporated herein by this reference. Plaintiff notified the Defendant’s  
13 Registered Agent, the Administrator of the United States Environmental Protection Agency  
14 (“USEPA”), the Administrator of USEPA Region 10, and the Director of the Washington  
15 Department of Ecology (“WDOE”) of its intent to sue Defendant by mailing copies of the Notice  
16 Letter to these officials on April 2, 2014.  
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19 4. More than sixty days have passed since the notice letter was served and the  
20 violations complained of in the notice letter identified below are continuing or are reasonably  
21 likely to continue to occur. Defendant is in violation of the CWA. No agency has commenced  
22 any action constituting diligent prosecution to redress all of these violations nor all of the relief  
23 sought herein.  
24

25 5. The source of the violations complained of is located in King County,  
26 Washington, within the Western District of Washington, and venue is therefore appropriate in  
27  
28

1 the Western District of Washington pursuant to Section 505(c)(1) of the CWA, 33 U.S.C. §  
2 1365(c)(1).

### 3 **III. PARTIES**

4 6. Plaintiff, Waste Action Project, is suing on behalf of itself and its member(s).  
5 Waste Action Project is a non-profit corporation registered in the State of Washington. Waste  
6 Action Project is a membership organization and has at least one member who is injured by  
7 Defendant's violations. Waste Action Project is dedicated to protecting and preserving the  
8 environment of Washington State, especially the quality of its waters.  
9

10 7. Plaintiff has representational standing to bring this action. Waste Action Project's  
11 members are reasonably concerned about the effects of discharges of pollutants, including  
12 stormwater from Defendant's facility, on aquatic species and wildlife that Plaintiff's members  
13 observe, study, and enjoy. Waste Action Project's members are further concerned about the  
14 effects of discharges from Defendant's facility on human health. In addition, discharges from  
15 Defendant's facility lessen Waste Action Project's members' aesthetic enjoyment of nearby  
16 areas. Waste Action Project's members' concerns about the effects of Defendant's discharges  
17 are aggravated by Defendant's failure to record and report information about its discharges and  
18 pollution controls. The recreational, scientific, economic, aesthetic and/or health interests of  
19 Waste Action Project and its member(s) have been, are being, and will be adversely affected by  
20 Defendant's violations of the CWA. The relief sought in this lawsuit can redress the injuries to  
21 these interests.  
22

23 8. Plaintiff has organizational standing to bring this action. Plaintiff has been  
24 actively engaged in a variety of educational, advocacy, and restoration efforts to improve water  
25 quality and to address sources of water quality degradation in the waters of western Washington,  
26  
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1 including the Mill (Springbrook) Creek— a short distance downstream from Defendant’s  
 2 facility. Defendant has failed to fulfill monitoring, recordkeeping, reporting and planning  
 3 requirements, among others, necessary for compliance with its NPDES permit and the CWA. As  
 4 a result, Plaintiff is deprived of information necessary to properly serve its members by  
 5 providing information and taking appropriate action. Plaintiff’s efforts to educate and advocate  
 6 for greater environmental protection, and to ensure the success of environmental restoration  
 7 projects implemented for the benefit of its members are also precluded. Finally, Plaintiff and the  
 8 public are deprived of information that influences members of the public to become members of  
 9 Waste Action Project, thereby reducing Waste Action Project’s membership numbers. Thus,  
 10 Plaintiff’s organizational interests have been adversely affected by Defendant’s violations.  
 11 These injuries are fairly traceable to Defendant’s violations and redressable by the Court.  
 12

13  
 14 9. Defendant is a corporation authorized to conduct business in the State of  
 15 Washington.  
 16

17 10. Defendant owns and operates a paper recycling facility located at or about 1225  
 18 6th Ave. N., Kent, WA 98032, including contiguous or adjacent properties owned or operated by  
 19 Defendant (the “facility”).  
 20

#### 21 **IV. LEGAL & FACTUAL BACKGROUND**

22 11. Section 301(a) of the CWA, 33 U.S.C. § 1311(a), prohibits the discharge of  
 23 pollutants by any person, unless in compliance with the provisions of the CWA. Section 301(a)  
 24 prohibits, inter alia, such discharges not authorized by, or in violation of, the terms of a NPDES  
 25 permit issued pursuant to Section 402 of the CWA, 33 U.S.C. § 1342.  
 26

27 12. The State of Washington has established a federally approved state NPDES  
 28 program administered by the WDOE. Wash. Rev. Code § 90.48.260; Wash. Admin. Code ch.  
 29

1 173-220. This program was approved by the Administrator of the USEPA pursuant to 33 U.S.C.  
2 § 1342(b).

3 13. Pursuant to Section 402(a) of the CWA, 33 U.S.C. § 1342(a), the WDOE has  
4 repeatedly issued the Industrial Stormwater General Permit (the “General Permit”), most recently  
5 on October 21, 2009, modified May 16, 2012 (the “2010 Permit”). The General Permit, in its  
6 various iterations since its first issuance in 1993 containing comparable requirements, authorizes  
7 those that obtain coverage under the General Permit to discharge stormwater associated with  
8 industrial activity, a pollutant under the CWA, and other pollutants contained in the stormwater  
9 to the waters of the State subject to certain terms and conditions.  
10

11  
12 14. The General Permit imposes certain terms and conditions on those covered  
13 thereby, including monitoring and sampling of discharges, reporting and recordkeeping  
14 requirements, as well as restrictions on the quality of stormwater discharges. To reduce and  
15 eliminate pollutant concentrations in stormwater discharges, the General Permit requires, among  
16 other things, that permittees develop and implement best management practices and a  
17 Stormwater Pollution Prevention Plan (“SWPPP”), and apply all known and reasonable methods  
18 of prevention, control, and treatment to discharges. The specific terms and conditions of the  
19 General Permit are described in detail in the Notice Letter, attached hereto as Exhibit 1, and  
20 incorporated herein by this reference.  
21  
22

23 15. Pursuant to Condition S2 of the General Permit, Defendant filed with the WDOE  
24 an Application for General Permit to Discharge Stormwater Associated with Industrial Activity.  
25 WDOE granted Defendant coverage under the General Permit for Defendant’s facility under  
26 Permit Number WAR004422.  
27  
28

1           16. Defendant's facility is engaged in industrial activities and discharges stormwater  
2 and other pollutants to the Mill (Springbrook Creek).

3           17. Defendant has violated the General Permit and Sections 301(a) and 402 of the  
4 CWA, 33 U.S.C. §§ 1311(a) and 1342, by discharging pollutants in violation of an NPDES  
5 Permit. Defendant's violations of the General Permit and the CWA are set forth in full in  
6 sections I through VI of the Notice Letter, attached hereto as Exhibit 1, and are incorporated  
7 herein by this reference. In particular and among the other violations described in the Notice  
8 Letter, Defendant has violated the monitoring requirements in the General Permit. Defendant  
9 has failed to take samples from each distinct point of discharge at the facility and has failed to  
10 submit discharge monitoring reports for each distinct point of discharge. Defendant has also  
11 failed to conduct visual monitoring and maintain inspection reports as required under the General  
12 Permit. For example, in violation of the General Permit, Defendant has failed to conduct  
13 monthly site inspections and/or complete inspection reports that include a certification of  
14 whether, in the judgment of all required persons, the site is in compliance with the SWPPP and  
15 the General Permit. These monitoring requirements and violations are described in section III of  
16 the Notice Letter, attached hereto as Exhibit 1, and are incorporated herein by this reference.  
17  
18  
19

20           18. Upon information and belief, Defendant has not developed and implemented best  
21 management practices and a Stormwater Pollution Prevention Plan in accordance with the  
22 requirements of the General Permit, nor applied all known and reasonable methods of  
23 prevention, control, and treatment to discharges from its facility. Defendant failed to include all  
24 of the required elements in its SWPPP regarding its site map, facility assessment, sampling plan,  
25 and employee training program. Further, Defendant's SWPPP fails to include all mandatory and  
26 applicable BMPs from the General Permit and associated stormwater management manuals.  
27  
28

These requirements and violations are described in detail in sections I and II of the Notice Letter, attached hereto as Exhibit 1, and are incorporated herein by this reference.

19. Defendant has violated the reporting and recordkeeping requirements of the General Permit. For example, Defendant has failed to include all of the required information in its annual reports to WDOE. These reporting and recordkeeping requirements and violations are described in sections IV and V of the Notice Letter, attached hereto as Exhibit 1, and are incorporated herein by this reference.

20. Defendant has discharged stormwater in excess of the General Permit benchmarks, including on the days on which it collected samples that are identified with bold numbers identified in Tables 1 and 2:

**TABLE 1: DISCHARGE MONITORING REPORT DATA FOR INTERNATIONAL PAPER'S FACILITY FROM 2008 TO 2009**

| Quarter in which sample collected | Turbidity (Benchmark 25 NTU) | pH (Benchmark 6-9 su) | Zn Concentration (Benchmark 117 ug/L) | Oil & Grease (Benchmark 15 mg/L) | Copper | Lead |
|-----------------------------------|------------------------------|-----------------------|---------------------------------------|----------------------------------|--------|------|
| 4th Quarter 2008                  | <b>55</b>                    | 6                     | <b>170</b>                            | <5                               | 8.7    | 7    |
| 1st Quarter 2009                  | 18                           | 6                     | <b>120</b>                            | <50                              | 15     | 3.1  |
| 2nd Quarter 2009                  | 25                           | 5                     | 72                                    | <5                               | 14.2   | 2.9  |

**TABLE 2: DISCHARGE MONITORING REPORT DATA FOR INTERNATIONAL PAPER'S FACILITY FROM 2010 TO 2013**

| Quarter in which sample collected | Turbidity (Benchmark 25 NTU) | pH (Benchmark 5-9 su) | Zn Concentration (Benchmark 117 ug/L) | Oil Sheen (Benchmark Yes) | Cu Concentration (Benchmark 14 ug/L) | Lead (Benchmark 81.6 ug/L) | TPH (Benchmark 10 mg/L) |
|-----------------------------------|------------------------------|-----------------------|---------------------------------------|---------------------------|--------------------------------------|----------------------------|-------------------------|
| 1st Quarter 2010                  | <b>27 NTU</b>                | 5 su                  | <b>120 ug/L</b>                       | N                         | 13.2 ug/L                            | 3.0 ug/L                   | <5 mg/L                 |
| 2nd Quarter 2010                  | 8.4                          | 5                     | 69                                    | N                         | 7.2                                  | 3.2                        | NR                      |
| 3rd Quarter 2010                  | <b>27</b>                    | 5                     | <b>130</b>                            | N                         | 12.2                                 | 2.8                        | 1.66                    |
| 4th Quarter 2010                  | <b>120</b>                   | 5                     | <b>320</b>                            | <b>19.4</b>               | <b>16.4</b>                          | 4.77                       |                         |
| 1st Quarter 2011                  | 18                           | 5                     | <b>130</b>                            | N                         | 5                                    | 1.8                        | .96                     |
| 2nd Quarter 2011                  | <b>46</b>                    | 5                     | <b>230</b>                            | N                         | <b>20</b>                            | 10.7                       | 2.09                    |
| 3rd Quarter 2011                  | <b>37</b>                    | 5                     | <b>230</b>                            | N                         | 13.6                                 | 4.6                        | 2.08                    |

COMPLAINT - 7

SMITH & LOWNEY, P.L.L.C.  
2317 EAST JOHN STREET  
SEATTLE, WASHINGTON 98112  
(206) 860-2883

|                  |            |   |            |   |             |      |      |
|------------------|------------|---|------------|---|-------------|------|------|
| 4th Quarter 2011 | <b>120</b> | 5 | <b>390</b> | 0 | <b>24.8</b> | 17.4 | 3.6  |
| 1st Quarter 2012 | <b>38</b>  | 5 | <b>120</b> | N | 9           | 4.9  | .92  |
| 2nd Quarter 2012 | <b>28</b>  | 5 | <b>120</b> | N | 8.5         | 4.3  | .65  |
| 4th Quarter 2012 | <b>100</b> | 5 | <b>320</b> | 0 | <b>25</b>   | 16.1 | 2.29 |
| 1st Quarter 2013 | <b>81</b>  | 5 | <b>200</b> | 0 | <b>14.8</b> | 7.8  | 1.05 |
| 2nd Quarter 2013 | <b>28</b>  | 5 | 87         | 0 | 8.7         | 3    | 1.14 |
| 3rd Quarter 2013 | 21         | 6 | 74         | N | 11.3        | 2.3  | 2.88 |
| 4th Quarter 2013 | <b>35</b>  | 6 | <b>140</b> | N | 11.2        | 5.2  | 1.44 |

The General Permit requires monitoring of representative discharges of Defendant's stormwater discharges and the stormwater samples identified in Table 1 are the stormwater monitoring results that Defendant has submitted to the Department of Ecology.

21. Condition S8.B. of the 2010 Permit requires a permittee to undertake a Level 1 corrective action whenever the permittee exceeds a benchmark value identified in Condition S5. A Level 1 corrective action comprises review of the SWPPP to ensure permit compliance, revisions to the SWPPP to include additional operational source control BMPs with the goal of achieving the applicable benchmark values in future discharges, including signature and certification of the revised SWPPP, summary of the Level 1 corrective action in the annual report, and full implementation of the revised SWPPP as soon as possible, but no later than the discharge monitoring report ("DMR") due date for the quarter the benchmark was exceeded. Condition S4.C. of the 2005 Permit includes a substantially similar requirement regarding the benchmarks identified in its Condition S4.D.

22. The General Permit modifications made effective July 1, 2012, require a permittee undertaking a Level 1 corrective action to review, revise, sign and certify the SWPPP within fourteen days of receipt of the sampling results that indicate a benchmark exceedence.

23. Condition S8.C. of the 2010 Permit requires a permittee to undertake a Level 2 corrective action whenever it exceeds a benchmark value for any two quarters during a calendar



1 year. A Level 2 corrective action comprises review of the SWPPP to ensure permit compliance,  
2 revision of the SWPPP to include additional structural source control BMPs with the goal of  
3 achieving the benchmark in future discharges, including signature and certification of the revised  
4 SWPPP in accordance with Condition S3.A.6., summary of the Level 2 corrective action  
5 (planned or taken) in the annual report, and full implementation of the revised SWPPP by  
6 September 30, 2012 (for Level 2 corrective actions triggered in 2011), or August 31 of the  
7 following year (for Level 2 corrective actions triggered in 2012 or later), including installation of  
8 necessary structural source control BMPs.  
9

10 24. Condition S8.D. of the 2010 Permit requires a permittee to undertake a Level 3  
11 corrective action whenever it exceeds a benchmark value for any three quarters during a calendar  
12 year. A Level 3 corrective action comprises review of the SWPPP to ensure permit compliance,  
13 revision of the SWPPP to include additional treatment BMPs with the goal of achieving the  
14 applicable benchmark values in future discharges, which revision must be signed and certified in  
15 accordance with S3.A.6. and the portion of the SWPPP dealing with treatment BMPs designed  
16 and stamped by a professional engineer, geologist, hydrogeologist, or Certified Professional in  
17 Storm Water Quality, summary of the Level 3 corrective action (planned or taken) in the annual  
18 report, and full implementation of the revised SWPPP, including installation of necessary  
19 treatment BMPs, by September 30 of the following year.  
20  
21

22 25. Defendant triggered Level 1 response requirements for each benchmark  
23 exceedence identified in Tables 1 and 2 but failed to complete each and every Level 1 response  
24 required by the General Permit.  
25  
26  
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1           26. Defendant triggered Level 2 response requirements for copper, as indicated by the  
2 benchmark exceedences in Table 2. On information and belief, Defendant has not performed a  
3 Level 2 response as required by the General Permit.

4           27. Defendant triggered Level 3 requirements for turbidity and zinc as indicated by  
5 the benchmark exceedences in Table 2. On information and belief, Defendant has not fulfilled  
6 all of the required elements for a Level 3 response as required by the General Permit for any of  
7 these Level 3 responses.

8           28. Discharges from Defendant's facility contribute to the polluted conditions of  
9 navigable waters, including Mill (Springbrook) Creek. The Mill (Springbrook) Creek is listed on  
10 WDOE's 303(d) list of waterbodies impaired by bacteria and dissolved oxygen. Discharges  
11 from Defendant's facility contribute to the ecological impacts that result from the polluted state  
12 of these waters, and to Plaintiff's and its members' injuries resulting therefrom.

13           29. The vicinity of the facility and the receiving waters are used by the citizens of  
14 Washington and visitors, as well as at least one of Plaintiff's members, for recreational activities,  
15 including boating, biking, fishing, and bird watching, and educational and scientific activities,  
16 including environmental restoration monitoring. Plaintiff's member(s) also derive(s) aesthetic  
17 benefits from the receiving waters. Plaintiff's and its members' enjoyment of these activities and  
18 waters is diminished by the polluted state of the receiving waters and by Defendant's  
19 contributions to such polluted state.

20           30. A significant penalty should be imposed against Defendant pursuant to the  
21 penalty factors set forth in 33 U.S.C. § 1319(d).

22           31. Defendant has benefited economically as a consequence of its violations.

32. Defendant's violations were avoidable had Defendant been diligent in overseeing facility operations and maintenance.

33. Defendant is a profitable business enterprise. Given its size and resources, Defendant can afford to pay a significant penalty and such penalty is required to meet the deterrence goals of the Clean Water Act's penalty factors.

34. Defendant's violations of the CWA degrade the environment and the water quality of the receiving water bodies.

#### **V. CAUSE OF ACTION**

35. The preceding paragraphs and the allegations in the Notice Letter, attached hereto as Exhibit 1, are incorporated herein.

36. Defendant's violations of its NPDES permit described herein and in the Notice Letter constitute violations of sections 301 and 402 of the Clean Water Act, 33 U.S.C. §§ 1311 and 1342, and violations of "effluent standard(s) or limitation(s)" as defined by section 505, 33 U.S.C. § 1365.

37. On information and belief, the violations committed by Defendant are ongoing or are reasonably likely to continue to occur. Any and all additional violations of the CWA which occur after those described in Plaintiff's Notice Letter but before a final decision in this action should be considered continuing violations subject to this Complaint.

38. Without the imposition of appropriate civil penalties and the issuance of an injunction, Defendant is likely to continue to violate the CWA to the further injury of the Plaintiff, its member(s) and others.

39. A copy of this Complaint is being served upon the Attorney General of the United States and the Administrator of the USEPA as required by 33 U.S.C. § 1365(c)(3).

**VI. RELIEF REQUESTED**

Wherefore, Plaintiff respectfully requests that this Court grant the following relief:

A. Issue a declaratory judgment that Defendant has violated and continues to be in violation of the General Permit and Sections 301 and 402 of the Clean Water Act, 33 U.S.C. §§ 1311 and 1342;

B. Enjoin Defendant from operating its facility in a manner that results in further violations of the Clean Water Act;

C. Order Defendant to immediately implement a Storm Water Pollution Prevention Plan that is in compliance with the General Permit, and to provide Plaintiff with a copy of this Plan;

D. Order Defendant to allow Plaintiff to participate in the development and implementation of Defendant's Storm Water Pollution Prevention Plan;

E. Order Defendant to provide Plaintiff, for a period beginning on the date of the Court's Order and running for three years after Defendant achieves compliance with the CWA, with copies of all reports and other documents which Defendant submits to the USEPA or to the WDOE regarding Defendant's coverage under any NPDES permit at the time it is submitted to these authorities;

F. Order Defendant to take specific actions to remediate the environmental harm caused by its violations;

G. Order Defendant to pay civil penalties of \$37,500.00 per day of violation for each violation committed by Defendant pursuant to Sections 309(d) and 505(a) of the CWA, 33 U.S.C. §§ 1319(d) and 1365(a), and 40 C.F.R. § 19;

1 H. Award Plaintiff their litigation expenses, including reasonable attorneys' and  
2 expert witness fees, as authorized by Section 505(d) of the CWA, 33 U.S.C. § 1365(d); and

3 I. Award such other relief as this Court deems appropriate.  
4

5 RESPECTFULLY SUBMITTED this 9th day of June, 2014.

6 SMITH & LOWNEY, PLLC  
7

8 By: /s/ Richard Smith  
9 Richard Smith, WSBA No. 21788

10 /s/ Elizabeth H. Zultoski  
11 Elizabeth H. Zultoski, WSBA No. 44988

12 Attorneys for Plaintiff  
13 2317 E. John St.  
14 Seattle, WA 98112  
15 Tel: (206) 860-2883  
16 Fax: (206) 860-4187  
17 E-mail: rasmithwa@igc.org, elizabethz@igc.org  
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EXHIBIT 1

**SMITH & LOWNEY, P.L.L.C.**

2317 EAST JOHN STREET  
SEATTLE, WASHINGTON 98112  
(206) 860-2883, FAX (206) 860-4187

April 2, 2014

**Via Certified Mail - Return Receipt Requested**

Managing Agent  
International Paper Co. dba International Paper Recycling  
1225 6th Ave. N  
Kent, WA 98032

Managing Agent  
International Paper Co.  
6400 Poplar Ave.  
Memphis, TN 38197

Re: **NOTICE OF INTENT TO SUE UNDER THE CLEAN WATER ACT AND  
REQUEST FOR COPY OF STORMWATER POLLUTION PREVENTION  
PLAN**

Dear Managing Agent:

We represent Waste Action Project, P.O. Box 4832, Seattle, WA 98194, (253) 639-7245. Any response or correspondence related to this matter should be directed to us at the letterhead address. This letter is to provide you with sixty days notice of Waste Action Project's intent to file a citizen suit against International Paper Co. dba International Paper Recycling ("International Paper") under section 505 of the Clean Water Act ("CWA"), 33 USC § 1365, for the violations described below. This letter is also a request for a copy of the complete and current stormwater pollution prevention plan ("SWPPP") required by International Paper's National Pollution Discharge Elimination System ("NPDES") permit.

International Paper was granted coverage effective August 4, 2008 under Washington's Industrial Stormwater General Permit issued by the Washington Department of Ecology ("Ecology") on August 21, 2002, effective September 20, 2002, modified on December 1, 2004, reissued on August 15, 2007, effective September 15, 2007, reissued again on October 15, 2008, effective November 15, 2008, and remaining effective through December 31, 2009, under National Pollutant Discharge Elimination System Permit No. SO3-00422B (the "2002 Permit"). International Paper was granted coverage under the subsequent iteration of the Washington Industrial Stormwater General Permit issued by Ecology on October 21, 2009, effective January 1, 2010, modified May 16, 2012, effective July 1, 2012, and set to expire on January 1, 2015, under National Pollutant Discharge Elimination System Permit No. WAR004422 (the "2010 Permit").

International Paper has violated and continues to violate the CWA (see Sections 301 and 402 of the CWA, 33 USC §§ 1311 and 1342) and the terms and conditions of the 2002

Permit and the 2010 Permit (collectively, the “Permits”) with respect to operations of, and discharges of stormwater and pollutants from, its facility located at or about 1225 6th Ave. N, Kent, WA 98032 (the “facility”) as described herein. The facility subject to this notice includes any contiguous or adjacent properties owned or operated by International Paper.

## **I. COMPLIANCE WITH STANDARDS.**

### **A. Violations of Water Quality Standards.**

Condition S10.A of the 2010 Permit prohibits discharges that cause or contribute to violations of water quality standards. Water quality standards are the foundation of the CWA and Washington’s efforts to protect clean water. In particular, water quality standards represent the U.S. Environmental Protection Agency (“EPA”) and Ecology’s determination, based on scientific studies, of the thresholds at which pollution starts to cause significant adverse effects on fish or other beneficial uses. For each water body in Washington, Ecology designates the “beneficial uses” that must be protected through the adoption of water quality standards.

A discharger must comply with both narrative and numeric criteria water quality standards. WAC 173-201A-010; WAC 173-201A-510 (“No waste discharge permit can be issued that causes or contributes to a violation of water quality criteria, except as provided for in this chapter.”). Narrative water quality standards provide legal mandates that supplement the numeric criteria. Furthermore, the narrative water quality standard applies with equal force even if Ecology has established a numeric water quality standard. Specifically, Condition S7 of the 2002 Permit and Condition S10.A of the 2010 Permit require that International Paper’s discharges not cause or contribute to an excursion of Washington State water quality standards.

International Paper discharges to Mill Creek (Springbrook) Creek via the Kent stormwater system. International Paper discharges stormwater that contains elevated levels of turbidity, zinc, oil, and copper, as indicated in the table of benchmark excursions below. These discharges cause and/or contribute to violations of water quality standards for turbidity, zinc, oil, copper, and aesthetic values in Mill Creek (Springbrook) Creek and have occurred each and every day during the last five years on which there was 0.1 inch or more of precipitation, and continue to occur. The applicable water quality standards include those listed in WAC 173-201A-240, -200(1)(e), and -260(2). Precipitation data from that time period is appended to this notice of intent to sue and identifies these days.

**TABLE 1: DISCHARGE MONITORING REPORT DATA FOR INTERNATIONAL PAPER'S FACILITY FROM 2008 TO 2009**

| Quarter in which sample collected | Turbidity (Benchmark 25 NTU) | pH (Benchmark 6-9 su) | Zn Concentration (Benchmark 117 ug/L) | Oil & Grease (Benchmark 15 mg/L) | Copper | Lead |
|-----------------------------------|------------------------------|-----------------------|---------------------------------------|----------------------------------|--------|------|
| 4th Quarter 2008                  | <u>55</u>                    | 6                     | <b>170</b>                            | <5                               | 8.7    | 7    |
| 1st Quarter 2009                  | 18                           | 6                     | <b>120</b>                            | <50                              | 15     | 3.1  |
| 2nd Quarter 2009                  | 25                           | 5                     | 72                                    | <5                               | 14.2   | 2.9  |

**TABLE 2: DISCHARGE MONITORING REPORT DATA FOR INTERNATIONAL PAPER'S FACILITY FROM 2010 TO 2013**

| Quarter in which sample collected | Turbidity (Benchmark 25 NTU) | pH (5-9 su) | Zn Concentration (Benchmark 117 ug/L) | Oil Sheen (Benchmark Yes) | Cu Concentration (Benchmark 14 ug/L) | Lead (Benchmark 81.6 ug/L) | TPH (Benchmark 10 mg/L) |
|-----------------------------------|------------------------------|-------------|---------------------------------------|---------------------------|--------------------------------------|----------------------------|-------------------------|
| 1st Quarter 2010                  | <b>27 NTU</b>                | 5 su        | <b>120 ug/L</b>                       | N                         | 13.2 ug/L                            | 3.0 ug/L                   | <5 mg/L                 |
| 2nd Quarter 2010                  | 8.4                          | 5           | 69                                    | N                         | 7.2                                  | 3.2                        | NR                      |
| 3rd Quarter 2010                  | <b>27</b>                    | 5           | <b>130</b>                            | N                         | 12.2                                 | 2.8                        | 1.66                    |
| 4th Quarter 2010                  | <b>120</b>                   | 5           | <b>320</b>                            | <b>19.4</b>               | <b>16.4</b>                          | 4.77                       |                         |
| 1st Quarter 2011                  | 18                           | 5           | <b>130</b>                            | N                         | 5                                    | 1.8                        | .96                     |
| 2nd Quarter 2011                  | <b>46</b>                    | 5           | <b>230</b>                            | N                         | <b>20</b>                            | 10.7                       | 2.09                    |
| 3rd Quarter 2011                  | <b>37</b>                    | 5           | <b>230</b>                            | N                         | 13.6                                 | 4.6                        | 2.08                    |
| 4th Quarter 2011                  | <b>120</b>                   | 5           | <b>390</b>                            | 0                         | <b>24.8</b>                          | 17.4                       | 3.6                     |
| 1st Quarter 2012                  | <b>38</b>                    | 5           | <b>120</b>                            | N                         | 9                                    | 4.9                        | .92                     |
| 2nd Quarter 2012                  | <b>28</b>                    | 5           | <b>120</b>                            | N                         | 8.5                                  | 4.3                        | .65                     |
| 4th Quarter 2012                  | <b>100</b>                   | 5           | <b>320</b>                            | 0                         | <b>25</b>                            | 16.1                       | 2.29                    |
| 1st Quarter 2013                  | <b>81</b>                    | 5           | <b>200</b>                            | 0                         | <b>14.8</b>                          | 7.8                        | 1.05                    |
| 2nd Quarter 2013                  | <b>28</b>                    | 5           | 87                                    | 0                         | 8.7                                  | 3                          | 1.14                    |

Bold = benchmark exceedances; underline = action level exceedances

## **B. Compliance with Standards.**

Condition S10.C of the 2010 Permit requires International Paper to apply all known and reasonable methods of prevention, control and treatment ("AKART") to all discharges, including preparation and implementation of an adequate SWPPP and best management practices ("BMPs"). Condition S9 of the 2002 Permit contains a substantially similar requirement. International Paper has violated and continues to violate these conditions by failing to apply AKART to its discharges or to implement an adequate SWPPP and BMPs as



evidenced by the elevated levels of pollutants in its discharge indicated in the table above and as described below in this notice of intent to sue.

Condition S3.A of the 2002 Permit and Condition S1.A of the 2010 Permit require that all discharges and activities authorized be consistent with the terms and conditions of the permits. International Paper has violated these conditions by discharging and acting inconsistent with the conditions of the Permits as described in this Notice of Intent to Sue.

## **II. STORMWATER POLLUTION PREVENTION PLAN VIOLATIONS.**

Condition S9 of the 2002 Permit and Condition S3.A.1 of the 2010 Permit require International Paper to develop and implement a SWPPP as specified. Conditions S9 and S9.B.3 of the 2002 Permit and Condition S3.A.2 of the 2010 Permit require the SWPPP to specify BMPs necessary to provide AKART and ensure that discharges do not cause or contribute to violations of water quality standards. On information and belief, International Paper has violated these requirements of the Permits each and every day during the last five years and continues to violate them as it has failed to prepare and/or implement a SWPPP that includes AKART BMPs and BMPs necessary to comply with state water quality standards.

Condition S9 of the 2002 Permit and Condition S3.A of the 2010 Permit require International Paper to have and implement a SWPPP that is consistent with permit requirements, fully implemented as directed by permit conditions, and updated as necessary to maintain compliance with permit conditions. On information and belief, International Paper has violated these requirements of the Permits each and every day during the last five years and continues to violate them because its SWPPP is not consistent with permit requirements, has not been fully implemented and has not been updated as necessary.

The SWPPP fails to satisfy the requirements of Condition S9 of the 2002 Permit and Condition S3 of the 2010 Permit because it does not adequately describe BMPs. Condition S9.B.3 of the 2002 Permit and Condition S3.B.4 of the 2010 Permit require that the SWPPP include a description of the BMPs that are necessary for the facility to eliminate or reduce the potential to contaminate stormwater. Condition S.9.B.3 of the 2002 Permit required that the SWPPP document how stormwater BMPs were selected, the pollutant removal performance expected from the BMP being selected and the technical basis that supports the performance claims for the BMPs being selected and an assessment of how the selected BMP will comply with state water quality standards, satisfy the state AKART requirements, and the federal technology-based treatment requirements under 40 CFR part 125.3. As described by this subcondition and the second and third prefatory paragraphs of Condition S9 of the 2002 Permit, in lieu of such documentation (“the demonstration approach”), a permittee could choose to follow the stormwater management practices contained in approved stormwater technical manuals (“the presumptive approach”). Condition S9.A.5 of the 2002 Permit directed permittees selecting the presumptive approach to “clearly state which of the approved stormwater technical manuals the BMPs in their SWPPP are based on.” Condition S3.A.3 of the 2010 Permit requires that the SWPPP include BMPs consistent with approved stormwater technical manuals or document how stormwater BMPs included in the SWPPP are demonstratively equivalent to the practices contained in the approved stormwater technical

manuals, including the proper selection, implementation, and maintenance of all applicable and appropriate BMPs. International Paper's SWPPP does not comply with these requirements because it does not adequately describe BMPs and does not include BMPs consistent with approved stormwater technical manuals nor does it include BMPs that are demonstratively equivalent to such BMPs with documentation of BMP adequacy.

International Paper's SWPPP fails to satisfy the requirements of Condition S9.B.1.a of the 2002 Permit and Condition S3.B.2 of the 2010 Permit because it fails to include a facility assessment as mandated. The SWPPP fails to include an adequate facility assessment because it does not describe the industrial activities conducted at the site, the general layout of the facility including buildings and storage of raw materials, the flow of goods and materials through the facility, regular business hours and seasonal variations in business hours or in industrial activities as required.

International Paper's SWPPP fails to satisfy the requirements of Condition S9.B.1.b of the 2002 Permit and Condition S3.B.1 of the 2010 Permit because it does not include a site map that identifies significant features, the stormwater drainage and discharge structures, the stormwater drainage areas for each stormwater discharge point off-site, a unique identifying number for each discharge point, each sampling location with a unique identifying number, paved areas and buildings, areas of pollutant contact associated with specific industrial activities, conditionally approved non-stormwater discharges, surface water locations, areas of existing and potential soil erosion, vehicle maintenance areas, and lands and waters adjacent to the site that may be helpful in identifying discharge points or drainage routes.

International Paper's SWPPP fails to comply with Condition S9.B.1.c of the 2002 Permit and Condition S3.B.2.b of the 2010 Permit because it does not include an inventory of industrial activities that identifies all areas associated with industrial activities that have been or may potentially be sources of pollutants as required. The SWPPP does not identify all areas associated with loading and unloading of dry bulk materials or liquids, outdoor storage of materials or products, outdoor manufacturing and processing, onsite dust or particulate generating processes, on-site waste treatment, storage, or disposal, vehicle and equipment fueling, maintenance, and/or cleaning, roofs or other surfaces exposed to air emissions from a manufacturing building or a process area, and roofs or other surfaces composed of materials that may be mobilized by stormwater as required by these conditions.

International Paper's SWPPP does not comply with Condition S9.B.1.d of the 2002 Permit and Condition S3.B.2.c of the 2010 Permit because it does not include an adequate inventory of materials. The SWPPP does not include an inventory of materials that lists the types of materials handled at the site that potentially may be exposed to precipitation or runoff and that could result in stormwater pollution, a short narrative for material describing the potential for the pollutants to be present in stormwater discharge that is updated when data becomes available to verify the presence or absence of the pollutants, a narrative description of any potential sources of pollutants from past activities, materials and spills that were previously handled, treated, stored, or disposed of in a manner to allow ongoing exposure to stormwater as required. The SWPPP does not include the method and location of on-site

storage or disposal of such materials and a list of significant spills and significant leaks of toxic or hazardous pollutants as these permit conditions require.

International Paper's SWPPP does not comply with Condition S9.B.3.a.i of the 2002 Permit and Condition S3.B.3 of the 2010 Permit because it does not identify specific individuals by name or title whose responsibilities include SWPPP development, implementation, maintenance and modification.

Condition S3.B.4 of the 2010 Permit requires that permittees include in their SWPPPs and implement certain mandatory BMPs no later than July 1, 2010 unless site conditions render the BMP unnecessary, infeasible, or an alternative and equally effective BMP is provided. International Paper is in violation of this requirement because it has failed to include in its SWPPP and implement the mandatory BMPs of the 2010 Permit.

International Paper's SWPPP does not comply with Condition S9.B.3.a of the 2002 Permit and Condition S3.B.4.b.i of the 2010 Permit because it does not include required operational source control BMPs in the following categories: good housekeeping (including definition of ongoing maintenance and cleanup of areas that may contribute pollutants to stormwater discharges, and a schedule/frequency for each housekeeping task); preventive maintenance (including BMPs to inspect and maintain stormwater drainage, source controls, treatment systems, and plant equipment and systems, and the schedule/frequency for each task); spill prevention and emergency cleanup plan (including BMPs to prevent spills that can contaminate stormwater, for material handling procedures, storage requirements, cleanup equipment and procedures, and spill logs); employee training (including an overview of what is in the SWPPP, how employees make a difference in complying with the SWPPP, spill response procedures, good housekeeping, maintenance requirements, and material management practices, how training will be conducted, the frequency/schedule of training, and a log of the dates on which specific employees received training); inspections and recordkeeping (including documentation of procedures to ensure compliance with permit requirements for inspections and recordkeeping, including identification of personnel who conduct inspections, provision of a tracking or follow-up procedure to ensure that a report is prepared and appropriate action taken in response to visual monitoring, definition of how International Paper will comply with signature and record retention requirements, and certification of compliance with the SWPPP and Permit).

International Paper's SWPPP does not comply with Condition S9.A.1 of the 2002 Permit and Condition S3.B.4.b.i.7 of the 2010 Permit because it does not include measures to identify and eliminate the discharge of process wastewater, domestic wastewater, noncontact cooling water, and other illicit discharges to stormwater sewers, or to surface waters and ground waters of the state.

International Paper's SWPPP does not comply with Condition S9.B.3.b of the 2002 Permit and Condition S3.B.4.b.ii of the 2010 Permit because it does not include required structural source control BMPs to minimize the exposure of manufacturing, processing, and material storage areas to rain, snow, snowmelt, and runoff. International Paper's SWPPP

does not comply with Condition S9.B.3.c of the 2002 Permit and Condition S3.B.4.b.iii of the 2010 Permit because it does not include treatment BMPs as required.

International Paper's SWPPP fails to comply with Condition S9.B.4 of the 2002 Permit and Condition S3.B.4.b.v of the 2010 Permit because it does not include BMPs to prevent the erosion of soils or other earthen materials and prevent off-site sedimentation and violations of water quality standards.

International Paper's SWPPP fails to satisfy the requirements of Condition S9.B.2 of the 2002 Permit and Condition S3.B.5 of the 2010 Permit because it fails to include a stormwater sampling plan as required. The SWPPP does not include a sampling plan that identifies points of discharge to surface waters, storm sewers, or discrete ground water infiltration locations, documents why each discharge point is not sampled, identifies each sampling point by its unique identifying number, identifies staff responsible for conducting stormwater sampling, specifies procedures for sampling collection and handling, specifies procedures for sending samples to the a laboratory, identifies parameters for analysis, holding times and preservatives, laboratory quantization levels, and analytical methods, and that specifies the procedure for submitting the results to Ecology.

### **III. MONITORING AND REPORTING VIOLATIONS.**

#### **A. Failure to Collect Quarterly Samples.**

Condition S4.A of the 2002 Permit and Condition S4.B of the 2010 Permit require International Paper to collect a sample of its stormwater discharge once during every calendar quarter. Condition S4.A of the 2002 Permit required International Paper collect such a sample at each distinct point of discharge offsite if activities and site conditions at the facility that may pollute the stormwater are likely to result in discharges that will significantly vary in the concentration or type of pollutants. Conditions S3.B.5.b and S4.B.2.c of the 2010 Permit require International Paper to collect stormwater samples at each distinct point of discharge offsite except for substantially identical outfalls, in which case only one of the substantially identical outfalls must be sampled. These conditions set forth sample collection criteria, but require the collection of a sample even if the criteria cannot be met.

International Paper violated these requirements by failing to collect stormwater samples at any of its discharge points during the following quarters:

- 3rd Quarter 2008
- 3rd Quarter 2009
- 4th Quarter 2009
- 3rd Quarter 2012
- 3rd Quarter 2013
- 4th Quarter 2013

International Paper has also violated and continues to violate these conditions because it does not sample each distinct point of discharge off-site. These violations have occurred

and continue to occur each and every quarter during the last five years that International Paper was and is required to sample its stormwater discharges, including the quarters in which it collected stormwater discharge samples from some, but not each, point of discharge. These violations will continue until International Paper commences monitoring all distinct points of discharge.

**B. Failure to Analyze Quarterly Samples.**

Condition S4.D.2 of the 2002 Permit required International Paper to analyze stormwater samples collected quarterly for turbidity, pH, total zinc, and oil and grease, copper, lead, and hardness. Condition S5.A.1 of the 2010 Permit requires International Paper to analyze stormwater samples collected quarterly for turbidity, pH, total copper, and total zinc, copper, lead, and total petroleum hydrocarbons (“TPH”).

International Paper violated these conditions by failing to analyze stormwater samples for any of the required parameters during the following quarters:

3rd Quarter 2008  
3rd Quarter 2009  
4th Quarter 2009  
3rd Quarter 2012  
3rd Quarter 2013  
4th Quarter 2013

**C. Failure to Timely Submit Discharge Monitoring Reports.**

Condition S5.A of the 2002 Permit and Condition S9.A of the 2010 Permit require International Paper to use DMR forms provided or approved by Ecology to summarize, report and submit monitoring data to Ecology. For each monitoring period (calendar quarter) a DMR must be completed and submitted to Ecology not later than 45 days after the end of the monitoring period. International Paper has violated these conditions by failing to submit a DMR within the time prescribed for the following quarters:

3rd Quarter 2009  
4th Quarter 2009  
3rd Quarter 2013  
4th Quarter 2013

**D. Failure to Comply with Visual Monitoring Requirements.**

Condition S4.D.1 of the 2002 Permit required International Paper to perform quarterly visual monitoring during stormwater sampling. This visual monitoring was to include observations made at sampling locations at the time of sampling; an inspection of stormwater discharges for the presence of floating materials, visible sheen, discoloration, turbidity, and odor; and an assessment of the best management practices required by the permit and the SWPPP. Discharge locations that were not sampled were to be visually inspected at least

annually during a storm event. The visual monitoring and inspections were to be conducted by the personnel specified by the SWPPP, who was to verify that the description of potential pollutant sources was accurate, that the site map required in the SWPPP had been updated or modified to reflect current conditions, and that the controls to reduce pollutants in stormwater discharges were implemented and adequate.

In addition to quarterly visual inspection during storm events, Condition S4.D.1 of the 2002 Permit required International Paper conduct at least one dry season (July, August, September) inspection each year and performed by the personnel specified in the SWPPP that occurred after at least seven consecutive days of no precipitation. The dry season inspection was to determine the presence of non-stormwater discharges, which must have been eliminated within thirty days unless authorized by the Permit. The 2002 Permit also required International Paper to notify Ecology if non-stormwater discharges were discovered.

The 2002 Permit required that the results of each inspection/visual monitoring event be summarized in an inspection report or checklist and entered into or attached to the SWPPP, and be signed by the person making the observations. Visual monitoring reports were to be reviewed and signed by a duly authorized representative of International Paper. Monitoring reports were to include a certification of whether, in the judgment of the person signing the report, International Paper was in compliance or non-compliance with the SWPPP and the 2002 Permit, and to identify any incidents of non-compliance. If the site inspection indicated that the requirements of the SWPPP or the Permit were not being met, the 2002 Permit required that the visual inspection report include a summary of the actions that will be taken to meet these requirements.

Condition S7.A of the 2010 Permit requires that monthly visual inspection be conducted at the facility by qualified personnel. Each inspection is to include observations made at stormwater sampling locations and areas where stormwater associated with industrial activity is discharged, observations for the presence of floating materials, visible oil sheen, discoloration, turbidity, odor, etc. in the stormwater discharges, observations for the presence of illicit discharges, a verification that the descriptions of potential pollutant sources required by the permit are accurate, a verification that the site map in the SWPPP reflects current conditions, and an assessment of all BMPs that have been implemented (noting the effectiveness of the BMPs inspected, the locations of BMPs that need maintenance, the reason maintenance is needed and a schedule for maintenance, and locations where additional of different BMPs are needed).

Condition S7.C of the 2010 Permit requires that International Paper record the results of each inspection in an inspection report or checklist that is maintained on-site and that documents the observations, verifications, and assessments required. The report/checklist must include the time and date of the inspection, the locations inspected, a statement that, in the judgment of the person conducting the inspection and the responsible corporate officer, the facility is either in compliance or out of compliance with the SWPPP and the 2010 Permit, a summary report and schedule of implementation of the remedial actions that International Paper plans to take if the site inspection indicates that the facility is out of compliance, the name, title, signature and certification of the person conducting the facility inspection, and a



certification and signature of the responsible corporate officer or a duly authorized representative.

International Paper is in violation of these requirements of Condition S4.D.1 of the 2002 Permit and Condition S7 of the 2010 Permit because, during the last five years, it has failed to conduct each of the requisite visual monitoring and inspections, failed to prepare and maintain the requisite inspection reports or checklists, and failed to make the requisite certifications and summaries.

#### **IV. CORRECTIVE ACTION VIOLATIONS.**

##### **A. Violations of the Level One Requirements of the 2010 Permit.**

Condition S8.B of the 2010 Permit requires International Paper take specified actions, called a “Level One Corrective Action,” each time quarterly stormwater sample results exceed a benchmark value or are outside the benchmark range for pH.

As described by Condition S8.B of the 2010 Permit, a Level One Corrective Action requires International Paper: (1) review the SWPPP for the facility and ensure that it fully complies with Condition S3 of the 2010 Permit and contains the correct BMPs from the applicable Stormwater Management Manual; (2) make appropriate revisions to the SWPPP to include additional operational source control BMPs with the goal of achieving the applicable benchmark values in future discharges and sign and certify the revised SWPPP in accordance with Condition S3.A.6 of the 2010 Permit; and (3) summarize the Level One Corrective Action in the Annual Report required under Condition S9.B of the 2010 Permit. Condition S8.B.4 of the 2010 Permit requires International Paper implement the revised SWPPP as soon as possible, and no later than the DMR due date for the quarter the benchmark was exceeded.

Condition S5.A and Table 2 of the 2010 Permit establish the following benchmarks: turbidity 25 NTU; pH 5 – 9 SU; total copper 14 µg/L; and total zinc 117 µg/L. Condition S5.B and Table 3 of the 2010 Permit establish the following additional benchmarks that are applicable to International Paper: lead, total 81.6 µg/L and total petroleum hydrocarbons 10 mg/L.

International Paper has violated the requirements of the 2010 Permit described above by failing to conduct a Level One Corrective Action in accordance with permit conditions, including the required review, revision and certification of the SWPPP, the required implementation of additional BMPs, and the required summarization in the annual report each time since January 1, 2010, its quarterly stormwater sampling results were greater than a benchmark or outside the benchmark range for pH, including the benchmark excursions listed in Table 2 above.

**B. Violations of the Level Two Requirements of the 2010 Permit.**

Condition S8.C of the 2010 Permit requires International Paper take specified actions, called a “Level Two Corrective Action,” each time quarterly stormwater sample results exceed an applicable benchmark value or are outside the benchmark range for pH for any two quarters during a calendar year.

As described by Condition S8.C of the 2010 Permit, a Level Two Corrective Action requires International Paper: (1) review the SWPPP for the facility and ensure that it fully complies with Condition S3 of the 2010 Permit; (2) make appropriate revisions to the SWPPP to include additional structural source control BMPs with the goal of achieving the applicable benchmark value(s) in future discharges and sign and certify the revised SWPPP in accordance with Condition S3.A.6 of the 2010 Permit; and (3) summarize the Level Two Corrective Action (planned or take) in the Annual Report required under Condition S9.B of the 2010 Permit. Condition S8.C.4 of the 2010 Permit requires International Paper implement the revised SWPPP according to condition S3 of the 2010 Permit and the applicable stormwater management manual as soon as possible, and no later than August 31st of the following year.

The 2010 Permit establishes the benchmarks applicable to International Paper described in section IV.A of this notice of intent to sue letter.

International Paper has violated the requirements of the 2010 Permit described above by failing to conduct a Level Two Corrective Action in accordance with permit conditions, including the required review, revision and certification of the SWPPP, the required implementation of additional BMPs, including additional structural source control BMPs, and the required summarization in the annual report each time since January 1, 2010, its quarterly stormwater sampling results were greater than a benchmark or outside the benchmark range for pH for any two quarters during a calendar year. As indicated in Table 2 above, these violations include, but are not limited to, International Paper’s failure to fulfill these obligations for copper triggered by its stormwater sampling during calendar year 2011.

**C. Violations of the Level Three Requirements of the 2010 Permit.**

Condition S8.D of the 2010 Permit requires International Paper take specified actions, called a “Level Three Corrective Action,” each time quarterly stormwater sample results exceed an applicable benchmark value or are outside the benchmark range for pH for any three quarters during a calendar year.

As described by Condition S8.D of the 2010 Permit, a Level Three Corrective Action requires International Paper: (1) review the SWPPP for the facility and ensure that it fully complies with Condition S3 of the 2010 Permit; (2) make appropriate revisions to the SWPPP to include additional treatment BMPs with the goal of achieving the applicable benchmark value(s) in future discharges and additional operational and/or structural source control BMPs if necessary for proper function and maintenance of treatment BMPs, and sign and certify the revised SWPPP in accordance with Condition S3.A.6 of the 2010 Permit; and (3) summarize



the Level Three Corrective Action (planned or take) in the Annual Report required under Condition S9.B of the 2010 Permit, including information on how monitoring, assessment, or evaluation information was (or will be) used to determine whether existing treatment BMPs will be modified/enhanced, or if new/additional treatment BMPs will be installed. Condition S8.D.2.b of the 2010 Permit requires that a licensed professional engineer, geologist, hydrogeologist, or certified professional in storm water quality must design and stamp the portion of the SWPPP that addresses stormwater treatment structures or processes.

Condition S8.D.3 of the 2010 Permit requires that, before installing BMPs that require the site-specific design or sizing of structures, equipment, or processes to collect, convey, treat, reclaim, or dispose of industrial stormwater, the International Paper submit an engineering report, plans, and specifications, and an operations and maintenance manual to Ecology for review in accordance with chapter 173-204 of the Washington Administrative Code. The engineering report must be submitted no later than the May 15 prior to the Level Three Corrective Action Deadline. The plans and specifications and the operations and maintenance manual must be submitted to Ecology at least 30 days before construction/installation.

Condition S8.D.5 of the 2010 Permit requires International Paper fully implement the revised SWPPP according to condition S3 of the 2010 Permit and the applicable stormwater management manual as soon as possible, and no later than September 30th of the following year.

The 2010 Permit establishes the benchmarks applicable to International Paper described in section IV.A of this notice of intent to sue letter.

International Paper has violated the requirements of the 2010 Permit described above by failing to conduct a Level Three Corrective Action in accordance with permit conditions, including the required review, revision and certification of the SWPPP, including the requirement to have a specified professional design and stamp the portion of the SWPPP pertaining to treatment, the required implementation of additional BMPs, including additional treatment BMPs, the required submission of an engineering report, plans, specifications, and an operations and maintenance plan, and the required summarization in the annual report each time since January 1, 2010, its quarterly stormwater sampling results were greater than a benchmark or outside the benchmark range for pH for any three quarters during a calendar year. As indicated in Table 2 above, these violations include, but are not limited to, International Paper's failure to fulfill these obligations for turbidity and zinc triggered by its stormwater sampling during calendar year 2010 and during calendar year 2012.

## **V. VIOLATIONS OF THE ANNUAL REPORT REQUIREMENTS.**

Condition S9.B of the 2010 Permit requires International Paper to submit an accurate and complete annual report to Ecology no later than May 15 of each year. The annual report must include corrective action documentation as required in Condition S8.B – D. If a corrective action is not yet completed at the time of submission of the annual report, International Paper must describe the status of any outstanding corrective action. Specific

information to be included in the annual report is identification of the conditions triggering the need for corrective action, description of the problem and identification of dates discovered, summary of any Level 1, 2, or 3 corrective actions completed during the previous calendar year, including the dates corrective actions completed, and description of the status of any Level 2 or 3 corrective actions triggered during the previous calendar year, including identification of the date International Paper expects to complete corrective actions.

International Paper has violated this condition. The annual report submitted by International Paper for 2010 (in May 2011) does not include the required information. Specifically, the report does not describe all of the stormwater problems identified, the report does not address the oil sheen and copper benchmark exceedences, and there is no description of additional operational BMPs International Paper implemented or plans to implement as part of its Level 1 corrective actions.

The annual report submitted by International Paper for 2011 (in March 2012) does not include the required information because it does not describe all of the stormwater problems identified.

The Annual Report submitted (in April 2013) by International Paper for 2012 does not include the required information because it does not describe all of the stormwater problems identified. The Annual Report submitted for 2012 also fails to address the copper exceedences and associated Level 1 response and fails to describe additional treatment BMPs International Paper implemented or plans to implement as part of its Level 3 corrective actions for zinc and turbidity.

## **VI. VIOLATIONS OF THE RECORDKEEPING REQUIREMENTS.**

### **A. Failure to Record Information.**

Condition S5.C of the 2002 Permit required International Paper to record specified information for each sample taken, including the date, exact place, method, and time of sampling or measurement; the individual who performed the sampling or measurement; the dates the analyses were performed; the individual who performed the analyses; the analytical techniques or methods used, and the results of all analyses. Condition S4.B.3 of the 2010 Permit requires International Paper record and retain specified information for each stormwater sample taken, including the sample date and time, a notation describing if International Paper collected the sample within the first 30 minutes of stormwater discharge event, an explanation of why International Paper could not collect a sample within the first 30 minutes of a stormwater discharge event, the sample location, method of sampling and of preservation, and the individual performing the sampling. Upon information and belief, International Paper is in violation of these conditions as it has not recorded each of these specified items for each sample taken during the last five years.

**B. Failure to Retain Records.**

Condition S5.B of the 2002 Permit required International Paper to retain records of all monitoring information, inspection reports, and any other documentation of compliance with permit requirements for a minimum of five years. Condition S9.C of the 2010 Permit requires International Paper to retain for a minimum of five years a copy of the 2010 Permit, a copy of International Paper's coverage letter, records of all sampling information, inspection reports including required documentation, any other documentation of compliance with permit requirements, all equipment calibration records, all BMP maintenance records, all original recordings for continuous sampling instrumentation, copies of all laboratory results, copies of all required reports, and records of all data used to complete the application for the 2010 Permit. Upon information and belief, International Paper is in violation of these conditions because it has failed to retain records of such information, reports, and other documentation during the last five years.

**VII. REQUEST FOR SWPPP.**

Pursuant to Condition S9.F of the 2010 Permit, Waste Action Project hereby requests that International Paper Company provide a copy of, or access to, its SWPPP complete with all incorporated plans, monitoring reports, checklists, and training and inspection logs. The copy of the SWPPP and any other communications about this request should be directed to the undersigned at the letterhead address.

Should International Paper fail to provide the requested complete copy of, or access to, its SWPPP as required by Condition S9.F of the Permit, it will be in violation of that condition, which violation shall also be subject to this notice of intent to sue and any ensuing lawsuit.

**VIII. CONCLUSION.**

The above-described violations reflect those indicated by the information currently available to Waste Action Project. These violations are ongoing. Waste Action Project intends to sue for all violations, including those yet to be uncovered and those committed after the date of this Notice of Intent to Sue.

Under Section 309(d) of the CWA, 33 USC § 1319(d), each of the above-described violations subjects the violator to a penalty of up to \$32,500 per day for each violation before and through January 12, 2009 and up to \$37,500 per day for each violation thereafter. In addition to civil penalties, Waste Action Project will seek injunctive relief to prevent further violations under Sections 505(a) and (d) of the CWA, 33 USC § 1365(a) and (d), and such other relief as is permitted by law. Also, Section 505(d) of the CWA, 33 USC § 1365(d), permits prevailing parties to recover costs, including attorney's fees.


Waste Action Project believes that this NOTICE OF INTENT TO SUE sufficiently states grounds for filing suit. We intend, at the close of the 60-day notice period, or shortly

thereafter, to file a citizen suit against International Paper Company under Section 505(a) of the Clean Water Act for violations.

During the 60-day notice period, we would be willing to discuss effective remedies for the violations addressed in this letter and settlement terms. If you wish to pursue such discussions in the absence of litigation, we suggest that you initiate those discussions within 10 days of receiving this notice so that a meeting can be arranged and so that negotiations may be completed promptly. We do not intend to delay the filing of a complaint if discussions are continuing when the notice period ends.

Very truly yours,

SMITH & LOWNEY, PLLC

By:   
Elizabeth H. Zultoski  
Richard A. Smith

cc: Gina McCarthy, Administrator, U.S. EPA  
Dennis McLerran, Region 10 Administrator, U.S. EPA  
Maia Bellon, Director, Washington Department of Ecology  
CT Corporation System, Registered Agent (505 Union Ave. Ste. 120, Olympia, WA 98501

| Date        | Precipitation<br>(inches) | Event         | Date        | Precipitation<br>(inches) | Event         | Date        | Precipitation<br>(inches) | Event         |
|-------------|---------------------------|---------------|-------------|---------------------------|---------------|-------------|---------------------------|---------------|
| <b>2009</b> | <b>Precip. (in<br/>)</b>  | <b>Events</b> | 11          | 0                         |               | 18          | 0                         |               |
| <b>Apr</b>  | <b>sum</b>                |               | 12          | 0                         |               | 19          | 0                         |               |
| 1           | 0.39                      | Rain , Snow   | 13          | 0                         |               | 20          | 0                         |               |
| 2           | 0.92                      | Rain          | 14          | 0                         |               | 21          | T                         |               |
| 3           | 0.09                      | Rain , Snow   | 15          | 0                         |               | 22          | 0                         |               |
| 4           | 0                         |               | 16          | 0                         |               | 23          | 0                         |               |
| 5           | 0                         |               | 17          | 0                         |               | 24          | 0                         |               |
| 6           | 0                         |               | 18          | 0.01                      | Rain          | 25          | 0.03                      | Rain          |
| 7           | 0                         |               | 19          | 0.09                      | Rain          | 26          | 0                         |               |
| 8           | 0                         |               | 20          | T                         |               | 27          | 0                         |               |
| 9           | 0.03                      | Rain          |             |                           | Rain ,        | 28          | 0.01                      | Rain          |
| 10          | 0.02                      | Rain          |             |                           | Thunderstor   | 29          | 0.36                      | Fog , Rain    |
| 11          | 0.06                      | Rain          | 21          | 0.04                      | m             | 30          | 0                         |               |
| 12          | 0.83                      | Rain          | 22          | 0.01                      | Rain          | 31          | 0                         | Fog           |
| 13          | 0.32                      | Rain          | 23          | T                         |               | <b>2009</b> | <b>Precip. (in<br/>)</b>  | <b>Events</b> |
| 14          | 0.01                      | Rain          | 24          | T                         | Rain          | <b>Sep</b>  | <b>sum</b>                |               |
| 15          | 0                         |               | 25          | 0.03                      | Rain          | 1           | T                         | Rain          |
| 16          | 0                         | Rain          | 26          | 0                         |               | 2           | 0                         |               |
| 17          | 0.25                      | Rain          | 27          | 0                         |               | 3           | 0.12                      | Rain          |
| 18          | 0                         |               | 28          | 0                         |               | 4           | T                         | Rain          |
| 19          | 0                         |               | 29          | 0                         |               | 5           | 0.31                      | Rain          |
| 20          | 0                         |               | 30          | 0                         |               |             |                           | Rain ,        |
| 21          | 0                         |               | <b>2009</b> | <b>Precip. (in<br/>)</b>  | <b>Events</b> |             |                           | Thunderstor   |
| 22          | 0.25                      | Rain          | <b>Jul</b>  | <b>sum</b>                |               | 6           | 0.93                      | m             |
| 23          | 0.06                      | Rain          | 1           | 0                         |               | 7           | 0.01                      | Rain          |
| 24          | 0                         |               | 2           | 0                         |               | 8           | 0                         | Fog           |
| 25          | 0                         |               | 3           | 0                         |               | 9           | 0.01                      | Rain          |
| 26          | 0                         |               | 4           | 0                         |               | 10          | 0                         |               |
| 27          | T                         |               | 5           | 0                         |               | 11          | 0                         |               |
| 28          | 0.12                      | Rain          | 6           | T                         |               | 12          | 0                         |               |
| 29          | T                         |               | 7           | T                         |               | 13          | 0                         |               |
| 30          | 0                         |               | 8           | 0                         |               | 14          | 0                         |               |
| <b>2009</b> | <b>Precip. (in<br/>)</b>  | <b>Events</b> | 9           | 0                         |               | 15          | 0                         |               |
| <b>May</b>  | <b>sum</b>                |               | 10          | 0                         |               | 16          | 0.01                      | Rain          |
| 1           | 0                         |               | 11          | 0                         |               | 17          | 0                         |               |
| 2           | 0.32                      | Rain          | 12          | 0.04                      | Rain          | 18          | 0                         |               |
| 3           | 0.01                      |               | 13          | 0.02                      | Rain          | 19          | 0.29                      | Rain          |
| 4           | 0.36                      | Rain          | 14          | 0                         |               | 20          | 0                         |               |
| 5           | 0.59                      | Rain          | 15          | 0                         | Fog           | 21          | 0                         |               |
| 6           | 0.89                      | Rain          | 16          | 0                         |               | 22          | 0                         |               |
| 7           | T                         | Rain          | 17          | 0                         |               | 23          | 0                         |               |
| 8           | 0                         |               | 18          | 0                         |               | 24          | 0                         |               |
| 9           | 0                         |               | 19          | 0                         |               | 25          | 0                         | Fog           |
| 10          | 0.04                      | Rain          | 20          | 0                         |               | 26          | 0                         |               |
| 11          | 0.03                      | Rain          | 21          | 0                         |               | 27          | 0                         |               |
| 12          | 0.04                      | Rain          | 22          | 0                         |               | 28          | T                         | Rain          |
| 13          | 0.44                      | Rain          | 23          | 0                         |               | 29          | 0.07                      | Rain          |
| 14          | 0.32                      | Rain          | 24          | 0                         |               | 30          | 0                         |               |
| 15          | 0                         |               |             |                           | Rain ,        | <b>2009</b> | <b>Precip. (in<br/>)</b>  | <b>Events</b> |
| 16          | 0                         |               |             |                           | Thunderstor   | <b>Oct</b>  | <b>sum</b>                |               |
| 17          | 0                         |               | 25          | T                         | m             | 1           | 0.08                      | Rain          |
| 18          | 0.45                      | Rain          | 26          | 0                         |               | 2           | 0.14                      | Rain          |
| 19          | 0.12                      | Rain          | 27          | 0                         |               | 3           | 0                         | Fog           |
| 20          | 0                         |               | 28          | 0                         |               | 4           | 0                         |               |
| 21          | 0                         |               | 29          | 0                         |               | 5           | 0                         |               |
| 22          | 0                         |               | 30          | 0                         |               | 6           | 0                         |               |
| 23          | 0                         |               | 31          | 0                         |               | 7           | 0                         |               |
| 24          | 0                         |               | <b>2009</b> | <b>Precip. (in<br/>)</b>  | <b>Events</b> | 8           | 0                         | Fog           |
| 25          | 0                         |               | <b>Aug</b>  | <b>sum</b>                |               | 9           | 0                         |               |
| 26          | 0                         |               | 1           | 0                         |               | 10          | 0                         |               |
| 27          | 0                         |               | 2           | 0                         |               | 11          | 0                         |               |
| 28          | 0                         |               | 3           | 0                         |               | 12          | 0                         |               |
| 29          | 0                         |               | 4           | 0                         |               | 13          | 0.17                      | Rain          |
| 30          | 0                         |               | 5           | 0                         |               | 14          | 0.51                      | Rain          |
| 31          | 0                         |               | 6           | 0                         |               | 15          | 0.07                      | Rain          |
| <b>2009</b> | <b>Precip. (in<br/>)</b>  | <b>Events</b> | 7           | 0                         |               | 16          | 0.78                      | Rain          |
| <b>Jun</b>  | <b>sum</b>                |               | 8           | 0                         |               | 17          | 1.24                      | Fog , Rain    |
| 1           | 0                         |               | 9           | T                         |               | 18          | 0.09                      | Rain          |
| 2           | 0                         |               | 10          | 0.13                      | Rain          | 19          | 0                         |               |
| 3           | 0                         |               | 11          | 0.32                      | Rain          | 20          | 0                         | Fog           |
| 4           | T                         |               | 12          | 0.15                      | Rain          | 21          | 0.16                      | Rain          |
| 5           | 0                         |               |             |                           | Rain ,        | 22          | 0.02                      | Rain          |
| 6           | T                         |               |             |                           | Thunderstor   | 23          | 0.41                      | Rain          |
| 7           | 0                         |               | 13          | 0.16                      | m             | 24          | 0                         |               |
| 8           | 0                         |               | 14          | T                         | Rain          | 25          | 0.06                      | Rain          |
| 9           | 0                         |               | 15          | 0                         |               |             |                           | Fog , Rain ,  |
| 10          | 0                         |               | 16          | 0                         |               |             |                           | Thunderstor   |
|             |                           |               | 17          | 0                         |               | 26          | 1.21                      | m             |

| Date        | Precipitation<br>(inches) | Event         | Date        | Precipitation<br>(inches) | Event         | Date        | Precipitation<br>(inches) | Event         |
|-------------|---------------------------|---------------|-------------|---------------------------|---------------|-------------|---------------------------|---------------|
| 27          | T                         | Rain          | 4           | 0.98                      | Rain          | 19          | 0                         |               |
| 28          | 0.08                      | Rain          | 5           | 0.14                      | Fog , Rain    | 20          | T                         | Rain          |
| 29          | 0.25                      | Rain          | 6           | 0                         |               | 21          | 0.01                      | Rain          |
| 30          | 0.23                      | Rain          | 7           | 0.04                      | Rain          | 22          | T                         | Rain          |
| 31          | 0.04                      | Rain          | 8           | 0.81                      | Rain          | 23          | 0                         |               |
| <b>2009</b> | <b>Precip. (in</b>        | <b>Events</b> | 9           | 0.08                      | Rain          | 24          | 0                         |               |
| <b>Nov</b>  | <b>)</b>                  |               | 10          | 0.09                      | Rain          | 25          | 0.62                      | Rain          |
|             | <b>sum</b>                |               | 11          | 1.07                      | Rain          | 26          | T                         | Rain          |
| 1           | 0                         |               | 12          | 0.53                      | Rain          | 27          | T                         |               |
| 2           | 0.01                      | Rain          | 13          | 0.27                      | Rain          | 28          | 0.47                      | Rain          |
| 3           | 0                         | Fog           | 14          | 0.28                      | Rain          | 29          | 0.92                      | Rain          |
| 4           | 0                         |               | 15          | 0.42                      | Rain          | 30          | 0.23                      | Rain          |
| 5           | 0.38                      | Rain          | 16          | 0.02                      | Fog , Rain    | 31          | T                         | Rain          |
|             |                           | Rain ,        | 17          | 0.15                      | Rain          | <b>2010</b> | <b>Precip. (in</b>        | <b>Events</b> |
|             |                           | Thunderstor   | 18          | T                         | Rain          | <b>Apr</b>  | <b>)</b>                  |               |
| 6           | 1.21                      | m             | 19          | 0.01                      | Rain          |             | <b>sum</b>                |               |
| 7           | 0.86                      | Rain          | 20          | T                         |               | 1           | 0.04                      | Rain          |
| 8           | 0.07                      | Rain          | 21          | T                         | Rain          | 2           | 0.75                      | Rain          |
| 9           | 0.37                      | Rain          | 22          | 0                         |               | 3           | 0.17                      | Rain          |
| 10          | 0.32                      | Rain          | 23          | 0.09                      | Rain          | 4           | 0.11                      | Rain          |
| 11          | 0.05                      | Rain          | 24          | 0.36                      | Rain          | 5           | 0.1                       | Rain          |
| 12          | 0                         |               | 25          | 0.06                      | Rain          | 6           | T                         | Rain          |
| 13          | 0.19                      | Rain          | 26          | 0                         |               | 7           | 0.15                      | Rain          |
| 14          | 0                         |               | 27          | 0                         | Fog           | 8           | 0.01                      | Rain          |
| 15          | 0.36                      | Rain          | 28          | 0                         |               | 9           | 0                         |               |
| 16          | 0.77                      | Rain          | 29          | 0.02                      | Rain          | 10          | 0                         |               |
| 17          | 0.44                      | Rain          | 30          | 0.18                      | Rain          | 11          | 0                         |               |
| 18          | 0.13                      | Rain          | 31          | 0.08                      | Fog , Rain    | 12          | T                         | Rain          |
| 19          | 0.7                       | Rain          | <b>2010</b> | <b>Precip. (in</b>        | <b>Events</b> | 13          | 0.16                      | Rain          |
| 20          | 0.29                      | Rain          | <b>Feb</b>  | <b>)</b>                  |               | 14          | 0                         |               |
| 21          | 0.31                      | Rain          |             | <b>sum</b>                |               | 15          | 0.02                      | Rain          |
| 22          | 0.55                      | Rain          | 1           | 0.08                      | Rain          | 16          | 0.03                      | Rain          |
| 23          | 0.05                      | Rain          | 2           | 0.01                      | Rain          |             |                           | Rain ,        |
| 24          | 0.2                       | Fog , Rain    | 3           | 0.31                      | Fog , Rain    |             |                           | Thunderstor   |
| 25          | 0.16                      | Fog , Rain    | 4           | 0.08                      | Rain          | 17          | 0.25                      | m             |
| 26          | 1.34                      | Fog , Rain    | 5           | 0.07                      | Rain          | 18          | 0                         | Fog           |
| 27          | 0                         |               | 6           | 0.13                      | Rain          | 19          | T                         |               |
| 28          | 0                         |               | 7           | 0.15                      | Rain          | 20          | 0.06                      | Rain          |
| 29          | 0                         |               | 8           | 0                         |               | 21          | 0.87                      | Rain          |
| 30          | 0.2                       | Rain          | 9           | 0                         | Fog           | 22          | 0                         |               |
| <b>2009</b> | <b>Precip. (in</b>        | <b>Events</b> | 10          | 0.11                      | Fog , Rain    | 23          | 0.05                      | Rain          |
| <b>Dec</b>  | <b>)</b>                  |               | 11          | 0.24                      | Rain          | 24          | 0.08                      | Rain          |
|             | <b>sum</b>                |               | 12          | 0.38                      | Rain          | 25          | 0                         |               |
| 1           | 0                         |               | 13          | 0.2                       | Rain          | 26          | 0.18                      | Rain          |
| 2           | 0                         | Fog           | 14          | 0.42                      | Rain          | 27          | 0.29                      | Rain          |
| 3           | 0                         |               | 15          | 0.07                      | Rain          | 28          | 0.13                      | Rain          |
| 4           | 0.04                      | Fog , Rain    | 16          | 0.21                      | Rain          | 29          | 0                         |               |
| 5           | 0                         |               | 17          | 0                         |               | 30          | 0.04                      | Rain          |
| 6           | 0                         |               | 18          | 0                         |               | <b>2010</b> | <b>Precip. (in</b>        | <b>Events</b> |
| 7           | 0                         |               | 19          | 0                         |               | <b>May</b>  | <b>)</b>                  |               |
| 8           | 0                         |               | 20          | 0                         |               |             | <b>sum</b>                |               |
| 9           | 0                         |               | 21          | 0                         |               | 1           | 0.01                      |               |
| 10          | 0                         |               | 22          | 0                         |               | 2           | 0.32                      | Rain          |
| 11          | 0                         |               | 23          | 0.16                      | Rain          | 3           | 0.03                      | Rain          |
| 12          | 0                         |               | 24          | 0.33                      | Rain          | 4           | 0.08                      | Rain          |
| 13          | T                         |               | 25          | 0.05                      | Rain          | 5           | 0.1                       | Rain          |
| 14          | 0.5                       | Rain          | 26          | 0.44                      | Rain          | 6           | 0                         |               |
| 15          | 0.29                      | Rain          | 27          | 0.08                      | Rain          | 7           | 0                         |               |
| 16          | 0.43                      | Rain          | 28          | 0                         |               | 8           | 0                         |               |
| 17          | 0.06                      | Rain          | <b>2010</b> | <b>Precip. (in</b>        | <b>Events</b> | 9           | 0                         |               |
| 18          | 0.02                      | Rain          | <b>Mar</b>  | <b>)</b>                  |               | 10          | 0.18                      | Rain          |
| 19          | 0.41                      | Fog , Rain    |             | <b>sum</b>                |               | 11          | 0                         |               |
| 20          | 0.08                      | Fog , Rain    | 1           | 0                         |               | 12          | 0                         |               |
| 21          | 0.55                      | Rain          | 2           | 0.09                      | Rain          | 13          | 0                         |               |
| 22          | 0.02                      | Rain          | 3           | 0                         |               | 14          | 0                         |               |
| 23          | T                         |               | 4           | 0.05                      | Rain          | 15          | 0                         |               |
| 24          | 0                         | Fog           | 5           | 0                         |               | 16          | 0.02                      | Rain          |
| 25          | 0                         | Fog           | 6           | 0                         |               | 17          | 0.01                      | Rain          |
| 26          | 0                         |               | 7           | 0.06                      | Rain          | 18          | 0.14                      | Rain          |
| 27          | 0                         | Fog           | 8           | 0.08                      | Rain , Snow   | 19          | 0.26                      | Rain          |
| 28          | T                         | Rain          | 9           | T                         | Rain          | 20          | 0.21                      | Rain          |
| 29          | 0.06                      | Fog , Rain    | 10          | 0.07                      | Rain          | 21          | 0.1                       | Rain          |
| 30          | 0.02                      | Rain          | 11          | 0.38                      | Rain          | 22          | 0.01                      | Rain          |
| 31          | 0.27                      | Rain          | 12          | 0.67                      | Rain          | 23          | 0.03                      | Rain          |
| <b>2010</b> | <b>Precip. (in</b>        | <b>Events</b> | 13          | 0.02                      | Rain          | 24          | 0                         |               |
| <b>Jan</b>  | <b>)</b>                  |               | 14          | T                         |               | 25          | 0.06                      | Rain          |
|             | <b>sum</b>                |               | 15          | T                         | Rain          | 26          | 0.23                      | Rain          |
| 1           | 0.4                       | Rain          | 16          | 0.08                      | Rain          | 27          | 0.11                      | Rain          |
| 2           | 0.06                      | Rain          | 17          | 0.01                      | Rain          | 28          | 0.45                      | Rain          |
| 3           | 0.03                      | Fog , Rain    | 18          | 0                         |               | 29          | 0.06                      | Rain          |

| Date        | Precipitation<br>(inches) | Event                      | Date        | Precipitation<br>(inches) | Event         | Date        | Precipitation<br>(inches) | Event                      |
|-------------|---------------------------|----------------------------|-------------|---------------------------|---------------|-------------|---------------------------|----------------------------|
| 30          | 0.11                      | Rain                       | 7           | 0.19                      | Rain          | 20          | 0                         | Fog                        |
| 31          | 0.31                      | Rain                       | 8           | 0.03                      |               | 21          | T                         | Fog , Rain                 |
| <b>2010</b> | <b>Precip. (in</b>        | <b>Events</b>              | 9           | T                         |               | 22          | 0.05                      | Rain                       |
| <b>Jun</b>  | <b>sum</b>                |                            | 10          | 0                         |               | 23          | 0.38                      | Rain                       |
| 1           | 0.15                      | Rain                       | 11          | 0                         |               | 24          | 0.72                      | Rain                       |
| 2           | 0.37                      | Rain                       | 12          | 0                         | Fog           | 25          | 1.08                      | Rain                       |
| 3           | 0.03                      | Rain                       | 13          | 0                         |               | 26          | 0.19                      | Rain                       |
| 4           | 0.18                      | Rain                       | 14          | 0                         |               | 27          | T                         | Rain                       |
| 5           | 0                         |                            | 15          | 0                         |               | 28          | 0.07                      | Rain                       |
| 6           | 0.33                      | Rain                       | 16          | 0                         |               | 29          | 0.01                      | Rain                       |
| 7           | 0.01                      | Rain                       | 17          | 0                         |               | 30          | 0.39                      | Fog , Rain                 |
| 8           | 0.25                      | Rain ,<br>Thunderstor<br>m | 18          | 0                         |               | 31          | 0.16                      | Rain                       |
| 9           | 0.25                      |                            | 19          | T                         |               | <b>2010</b> | <b>Precip. (in</b>        | <b>Events</b>              |
| 10          | 0.18                      | Rain                       | 20          | 0                         |               | <b>Nov</b>  | <b>sum</b>                |                            |
| 11          | 0.1                       | Rain                       | 21          | 0.01                      | Rain          | 1           | 1.56                      | Rain                       |
| 12          | 0                         |                            | 22          | 0                         |               | 2           | 0.02                      | Rain                       |
| 13          | 0                         |                            | 23          | 0                         |               | 3           | 0                         |                            |
| 14          | 0                         |                            | 24          | 0                         |               | 4           | 0                         |                            |
| 15          | 0.19                      | Rain                       | 25          | 0                         |               | 5           | 0.17                      | Rain                       |
| 16          | 0.18                      | Rain                       | 26          | T                         |               | 6           | 0.7                       | Rain                       |
| 17          | 0                         |                            | 27          | 0                         |               | 7           | 0.06                      | Rain                       |
| 18          | 0                         |                            | 28          | 0                         |               | 8           | 0                         |                            |
| 19          | 0.06                      | Rain                       | 29          | 0                         |               | 9           | 0.22                      | Rain                       |
| 20          | 0.21                      | Rain                       | 30          | 0                         |               | 10          | T                         |                            |
| 21          | 0                         |                            | 31          | 0.39                      | Rain          | 11          | 0.13                      | Rain                       |
| 22          | 0                         | Fog                        | <b>2010</b> | <b>Precip. (in</b>        | <b>Events</b> | 12          | 0                         |                            |
| 23          | 0                         |                            | <b>Sep</b>  | <b>sum</b>                |               | 13          | 0.12                      | Rain                       |
| 24          | 0                         |                            | 1           | 0                         |               | 14          | 0.27                      | Fog , Rain                 |
| 25          | T                         |                            | 2           | 0                         |               | 15          | 0.14                      | Rain                       |
| 26          | 0                         |                            | 3           | 0                         |               | 16          | 0                         |                            |
| 27          | 0                         |                            | 4           | 0.01                      | Rain          | 17          | 0.17                      | Rain                       |
| 28          | 0                         |                            | 5           | 0                         |               | 18          | 0.2                       | Rain                       |
| 29          | 0                         |                            | 6           | 0.12                      | Rain          | 19          | 0.06                      | Rain                       |
| 30          | 0                         |                            | 7           | 0.26                      | Rain          | 20          | T                         |                            |
| <b>2010</b> | <b>Precip. (in</b>        | <b>Events</b>              | 8           | 0.31                      | Rain          | 21          | 0.01                      | Snow                       |
| <b>Jul</b>  | <b>sum</b>                |                            | 9           | 0.03                      | Rain          | 22          | 0.15                      | Fog , Snow                 |
| 1           | 0.01                      | Rain                       | 10          | 0                         |               | 23          | T                         | Snow                       |
| 2           | 0.18                      | Rain                       | 11          | 0                         |               | 24          | 0                         |                            |
| 3           | 0                         |                            | 12          | 0                         |               | 25          | 0.01                      | Rain , Snow                |
| 4           | 0.11                      | Rain                       | 13          | 0                         |               | 26          | 0.29                      | Fog , Rain                 |
| 5           | 0                         |                            | 14          | 0                         | Fog           | 27          | 0.01                      | Fog , Rain                 |
| 6           | 0                         |                            | 15          | 0.14                      | Fog , Rain    | 28          | 0.02                      | Rain                       |
| 7           | 0                         |                            | 16          | 0.6                       | Rain          | 29          | 0.1                       | Rain                       |
| 8           | 0                         |                            | 17          | 1.49                      | Fog , Rain    | 30          | 0.64                      | Rain                       |
| 9           | 0                         |                            | 18          | 0.78                      | Fog , Rain    | <b>2010</b> | <b>Precip. (in</b>        | <b>Events</b>              |
| 10          | T                         |                            | 19          | 0.36                      | Fog , Rain    | <b>Dec</b>  | <b>sum</b>                |                            |
| 11          | 0                         | Fog                        | 20          | 0.02                      | Rain          | 1           | T                         |                            |
| 12          | T                         |                            | 21          | 0                         | Fog           | 2           | T                         | Fog , Rain                 |
| 13          | 0                         |                            | 22          | 0                         |               | 3           | 0                         |                            |
| 14          | 0                         |                            | 23          | 0.26                      | Rain          | 4           | 0                         |                            |
| 15          | 0                         | Fog                        | 24          | 0                         | Rain          | 5           | T                         | Rain                       |
| 16          | 0                         |                            | 25          | 0                         |               | 6           | 0.01                      | Rain                       |
| 17          | 0                         |                            | 26          | 0.39                      | Rain          | 7           | 0.35                      | Rain                       |
| 18          | 0                         |                            | 27          | 0.03                      | Rain          |             |                           | Rain ,<br>Thunderstor<br>m |
| 19          | 0                         |                            | 28          | T                         | Rain          | 8           | 0.51                      |                            |
| 20          | 0                         | Fog                        | 29          | 0                         | Fog           | 9           | 0.89                      | Rain                       |
| 21          | 0                         | Fog                        | 30          | T                         |               | 10          | 0                         |                            |
| 22          | 0.01                      |                            | <b>2010</b> | <b>Precip. (in</b>        | <b>Events</b> | 11          | 1.42                      | Rain                       |
| 23          | 0                         |                            | <b>Oct</b>  | <b>sum</b>                |               | 12          | 2.19                      | Rain                       |
| 24          | 0                         |                            | 1           | 0                         | Fog           | 13          | 0.46                      | Rain                       |
| 25          | 0                         |                            | 2           | 0                         |               |             |                           | Rain ,<br>Thunderstor<br>m |
| 26          | 0                         |                            | 3           | 0                         |               | 14          | 0.82                      |                            |
| 27          | 0                         |                            | 4           | 0                         |               | 15          | 0.11                      | Rain                       |
| 28          | 0                         |                            | 5           | 0                         |               | 16          | 0.02                      | Rain                       |
| 29          | 0                         |                            | 6           | 0                         |               | 17          | 0                         |                            |
| 30          | 0                         | Fog                        | 7           | 0                         |               | 18          | 0.08                      | Rain                       |
| 31          | 0                         | Fog                        | 8           | 0.12                      | Rain          | 19          | 0.14                      | Rain                       |
| <b>2010</b> | <b>Precip. (in</b>        | <b>Events</b>              | 9           | 1.21                      | Rain          | 20          | 0.03                      | Rain                       |
| <b>Aug</b>  | <b>sum</b>                |                            | 10          | 0.74                      | Rain          | 21          | 0.01                      | Rain                       |
| 1           | 0                         |                            | 11          | 0                         |               | 22          | 0.01                      | Rain                       |
| 2           | 0                         | Fog                        | 12          | 0                         |               | 23          | 0.25                      | Rain                       |
| 3           | 0                         | Fog                        | 13          | 0                         | Fog           | 24          | 0.44                      | Rain                       |
| 4           | 0                         | Fog                        | 14          | 0                         | Rain          | 25          | 0.32                      | Rain                       |
| 5           | 0.02                      | Rain                       | 15          | 0                         |               | 26          | 0.09                      | Rain                       |
| 6           | 0                         |                            | 16          | 0                         |               | 27          | 0.44                      | Rain                       |
|             |                           |                            | 17          | 0                         | Fog           | 28          | 0.01                      |                            |
|             |                           |                            | 18          | 0                         |               |             |                           |                            |
|             |                           |                            | 19          | 0                         | Fog           |             |                           |                            |



| Date        | Precipitation<br>(inches) | Event                             | Date        | Precipitation<br>(inches) | Event         | Date        | Precipitation<br>(inches) | Event         |
|-------------|---------------------------|-----------------------------------|-------------|---------------------------|---------------|-------------|---------------------------|---------------|
|             |                           | Rain , Snow ,<br>Thunderstor<br>m | 7           | T                         |               | 20          | 0                         |               |
| 29          | 0.09                      |                                   | 8           | 0.16                      | Rain          | 21          | 0.04                      | Rain          |
| 30          | 0                         |                                   | 9           | 1.47                      | Rain          | 22          | 0                         |               |
| 31          | 0                         |                                   | 10          | 0.55                      | Rain          | 23          | 0                         |               |
| <b>2011</b> | <b>Precip. (in<br/>)</b>  | <b>Events</b>                     | 11          | T                         | Rain          | 24          | 0                         |               |
| <b>Jan</b>  | <b>sum</b>                |                                   | 12          | 0.41                      | Rain          | 25          | 0.41                      | Rain          |
| 1           | 0                         |                                   | 13          | 0.33                      | Rain          | 26          | 0.01                      | Rain          |
| 2           | 0                         |                                   | 14          | 0.12                      | Rain          | 27          | 0.02                      | Rain          |
| 3           | 0                         |                                   | 15          | 0.37                      | Rain          | 28          | 0.01                      | Rain          |
| 4           | 0.03                      | Rain                              | 16          | 0.09                      | Rain          | 29          | 0                         |               |
| 5           | 0.12                      | Rain                              | 17          | T                         | Rain          | 30          | T                         | Rain          |
| 6           | 0.17                      | Rain                              | 18          | 0.27                      | Rain          | 31          | 0.11                      | Rain          |
| 7           | 0.37                      | Rain                              | 19          | 0                         |               | <b>2011</b> | <b>Precip. (in<br/>)</b>  | <b>Events</b> |
| 8           | 0.03                      | Rain                              | 20          | 0.01                      | Rain          | <b>Jun</b>  | <b>sum</b>                |               |
| 9           | 0.02                      | Rain , Snow                       | 21          | 0.01                      | Rain          | 1           | 0.17                      | Rain          |
| 10          | T                         | Snow                              | 22          | T                         | Rain          | 2           | 0.08                      | Rain          |
| 11          | 0.3                       | Fog , Snow                        | 23          | 0                         |               | 3           | 0                         |               |
| 12          | 0.81                      | Rain , Snow                       | 24          | 0.23                      | Rain          | 4           | 0                         |               |
| 13          | 0.82                      | Rain                              | 25          | 0.33                      | Rain          | 5           | 0                         |               |
| 14          | 0.29                      | Rain                              | 26          | 0.15                      | Rain          | 6           | 0                         |               |
| 15          | 0.45                      | Rain                              | 27          | 0.28                      | Rain          | 7           | 0.21                      | Rain          |
| 16          | 0.27                      | Rain                              | 28          | 0.14                      | Rain          | 8           | T                         |               |
| 17          | 0.04                      | Rain                              | 29          | 0.12                      | Rain          | 9           | 0                         |               |
| 18          | 0.08                      | Rain                              | 30          | 0.26                      | Rain          | 10          | 0                         |               |
| 19          | 0                         |                                   | 31          | 0.32                      | Rain          | 11          | 0                         |               |
| 20          | 0.05                      | Rain                              | <b>2011</b> | <b>Precip. (in<br/>)</b>  | <b>Events</b> | 12          | 0.01                      | Rain          |
| 21          | 0.51                      | Rain                              | <b>Apr</b>  | <b>sum</b>                |               | 13          | 0.11                      | Rain          |
| 22          | T                         | Rain                              | 1           | 1.13                      | Rain          | 14          | 0                         |               |
| 23          | 0.04                      | Rain                              | 2           | 0.37                      | Rain          | 15          | 0.06                      | Rain          |
| 24          | 0.21                      | Fog , Rain                        | 3           | 0.06                      | Rain          | 16          | 0                         |               |
| 25          | 0                         |                                   | 4           | 0.24                      | Rain          | 17          | 0                         |               |
| 26          | 0                         | Fog                               | 5           | 0.23                      | Rain          | 18          | 0.41                      | Rain          |
| 27          | 0                         | Fog                               | 6           | 0.12                      | Rain          | 19          | 0.03                      | Rain          |
| 28          | 0.14                      | Rain                              | 7           | 0.08                      | Fog , Rain    | 20          | 0                         |               |
| 29          | 0.24                      | Rain                              | 8           | 0                         |               | 21          | 0                         |               |
| 30          | T                         | Rain                              | 9           | 0.01                      | Rain          | 22          | 0                         |               |
| 31          | 0                         |                                   | 10          | 0.16                      | Rain          | 23          | 0.07                      | Rain          |
| <b>2011</b> | <b>Precip. (in<br/>)</b>  | <b>Events</b>                     | 11          | T                         | Rain          | 24          | 0.26                      | Rain          |
| <b>Feb</b>  | <b>sum</b>                |                                   | 12          | 0                         |               | 25          | 0.01                      | Rain          |
| 1           | 0                         |                                   | 13          | 0.17                      | Rain          | 26          | 0                         |               |
| 2           | 0                         |                                   | 14          | 0.4                       | Rain          | 27          | T                         | Rain          |
| 3           | 0.01                      | Rain                              | 15          | 0.09                      | Rain          | 28          | T                         | Rain          |
| 4           | 0.07                      | Rain                              | 16          | 0.06                      | Rain          | 29          | T                         | Rain          |
| 5           | 0.08                      | Rain                              | 17          | 0.01                      |               | 30          | 0                         |               |
| 6           | 0.25                      | Rain                              | 18          | 0.01                      | Rain          | <b>2011</b> | <b>Precip. (in<br/>)</b>  | <b>Events</b> |
| 7           | 0.05                      | Rain                              | 19          | 0                         |               | <b>Jul</b>  | <b>sum</b>                |               |
| 8           | T                         |                                   | 20          | T                         | Rain          | 1           | 0                         |               |
| 9           | 0                         |                                   | 21          | T                         | Rain          | 2           | 0                         |               |
| 10          | 0                         |                                   | 22          | T                         | Rain          | 3           | 0                         |               |
| 11          | 0                         |                                   | 23          | 0                         |               | 4           | 0                         |               |
| 12          | 0.37                      | Rain                              | 24          | 0.18                      | Rain          | 5           | 0                         |               |
| 13          | 0.24                      | Rain                              | 25          | 0.52                      | Rain          | 6           | 0                         |               |
| 14          | 0.54                      | Rain                              | 26          | 0.01                      | Rain          | 7           | 0.03                      |               |
| 15          | 0.09                      | Rain                              | 27          | 0.45                      | Rain          | 8           | 0.01                      |               |
| 16          | 0.04                      | Rain , Snow                       | 28          | 0.04                      | Rain          | 9           | 0                         |               |
| 17          | 0.11                      | Rain , Snow                       | 29          | T                         | Rain          | 10          | 0                         |               |
| 18          | 0                         |                                   | 30          | 0.13                      | Rain          | 11          | T                         | Rain          |
| 19          | 0                         |                                   | <b>2011</b> | <b>Precip. (in<br/>)</b>  | <b>Events</b> | 12          | 0.08                      | Rain          |
| 20          | 0                         |                                   | <b>May</b>  | <b>sum</b>                |               | 13          | T                         | Rain          |
| 21          | 0.03                      | Rain                              | 1           | T                         |               | 14          | 0.02                      | Rain          |
| 22          | 0.04                      | Rain , Snow                       | 2           | 0.18                      | Rain          | 15          | 0.02                      | Rain          |
|             |                           | Fog , Rain ,                      | 3           | T                         | Rain          | 16          | 0.35                      | Rain          |
| 23          | 0.24                      | Snow                              | 4           | 0                         |               | 17          | 0.07                      | Rain          |
| 24          | T                         | Snow                              | 5           | 0.03                      | Rain          | 18          | 0                         | Fog           |
| 25          | 0                         |                                   | 6           | 0.13                      | Rain          | 19          | 0                         |               |
| 26          | T                         | Snow                              | 7           | 0.04                      | Rain          | 20          | 0                         |               |
| 27          | 0.47                      | Rain , Snow                       | 8           | 0.02                      | Rain          | 21          | T                         |               |
| 28          | 0.42                      | Rain , Snow                       | 9           | 0                         |               | 22          | 0                         |               |
| <b>2011</b> | <b>Precip. (in<br/>)</b>  | <b>Events</b>                     | 10          | 0                         |               | 23          | 0                         |               |
| <b>Mar</b>  | <b>sum</b>                |                                   | 11          | 0.42                      | Rain          | 24          | 0                         |               |
| 1           | 0.24                      | Rain                              | 12          | 0                         |               | 25          | 0.13                      | Rain          |
| 2           | 0.07                      | Rain                              | 13          | 0                         |               | 26          | 0                         |               |
| 3           | 0.22                      | Rain                              | 14          | 0.97                      | Rain          | 27          | 0                         |               |
| 4           | 0.12                      | Rain                              | 15          | 0.81                      | Fog , Rain    | 28          | 0                         |               |
| 5           | 0.02                      | Rain                              | 16          | 0                         |               | 29          | 0                         |               |
| 6           | 0                         |                                   | 17          | 0                         |               | <b>30</b>   | <b>0</b>                  |               |
|             |                           |                                   | 18          | 0                         |               | 31          | T                         |               |
|             |                           |                                   | 19          | 0                         |               | <b>2011</b> | <b>Precip. (in<br/>)</b>  | <b>Events</b> |



| Date        | Precipitation<br>(inches) | Event         | Date        | Precipitation<br>(inches) | Event         | Date        | Precipitation<br>(inches) | Event         |
|-------------|---------------------------|---------------|-------------|---------------------------|---------------|-------------|---------------------------|---------------|
|             | )                         |               | 12          | T                         |               | 24          | T                         | Rain          |
| <b>Aug</b>  | <b>sum</b>                |               | 13          | 0                         | Fog           | 25          | 0.03                      | Rain          |
| 1           | 0                         |               | 14          | 0.01                      | Rain          | 26          | 0.05                      | Rain          |
| 2           | 0                         |               | 15          | 0                         |               | 27          | 0.9                       | Rain          |
| 3           | 0                         |               | 16          | 0                         |               | 28          | 0.63                      | Rain          |
| 4           | 0                         |               | 17          | 0                         |               | 29          | 0.29                      | Rain          |
| 5           | T                         |               | 18          | 0                         | Fog           | 30          | 0.07                      | Rain          |
| 6           | 0                         |               | 19          | T                         | Fog           | 31          | 0                         |               |
| 7           | 0                         |               | 20          | T                         | Rain          | <b>2012</b> | <b>Precip. (in</b>        | <b>Events</b> |
| 8           | 0                         |               | 21          | 0.12                      | Fog , Rain    |             | <b>)</b>                  |               |
| 9           | 0                         |               | 22          | 0.58                      | Rain          | <b>Jan</b>  | <b>sum</b>                |               |
| 10          | 0                         |               | 23          | 0                         |               | 1           | T                         |               |
| 11          | 0                         |               | 24          | 0                         |               | 2           | 0.43                      | Rain          |
| 12          | 0                         | Fog           | 25          | 0                         |               | 3           | 0.03                      | Rain          |
| 13          | 0                         |               | 26          | 0.02                      | Fog , Rain    | 4           | 0.8                       | Rain          |
| 14          | T                         |               | 27          | 0                         | Fog           | 5           | 0.05                      | Rain          |
| 15          | 0                         |               | 28          | 0.5                       | Rain          | 6           | 0.1                       | Rain          |
| 16          | 0                         |               | 29          | 0                         |               | 7           | T                         | Rain          |
| 17          | 0                         |               | 30          | 0.16                      | Rain          | 8           | 0                         |               |
| 18          | 0                         |               | 31          | T                         |               | 9           | 0.17                      | Rain          |
| 19          | 0                         |               | <b>2011</b> | <b>Precip. (in</b>        | <b>Events</b> | 10          | 0.04                      | Rain          |
| 20          | 0                         |               |             | <b>)</b>                  |               | 11          | 0                         |               |
| 21          | 0                         |               | <b>Nov</b>  | <b>sum</b>                |               | 12          | 0                         |               |
| 22          | 0.12                      | Rain          | 1           | 0                         |               | 13          | 0                         |               |
| 23          | 0                         |               | 2           | 0.35                      | Fog , Rain    | 14          | 0.16                      | Rain , Snow   |
| 24          | 0                         |               | 3           | 0                         |               | 15          | 0.21                      | Snow          |
| 25          | 0                         |               | 4           | 0.05                      | Fog , Rain    | 16          | 0.1                       | Snow          |
| 26          | 0                         |               | 5           | 0                         |               | 17          | 0.32                      | Fog , Snow    |
| 27          | 0                         |               | 6           | 0                         |               |             |                           | Fog , Rain ,  |
| 28          | 0                         | Fog           | 7           | 0.01                      | Rain          | 18          | 0.78                      | Snow          |
| 29          | T                         |               | 8           | T                         |               | 19          | 0.6                       | Rain , Snow   |
| 30          | 0.01                      |               | 9           | T                         |               |             |                           | Fog , Rain ,  |
| 31          | 0                         |               | 10          | 0                         |               | 20          | 0.53                      | Snow          |
| <b>2011</b> | <b>Precip. (in</b>        | <b>Events</b> | 11          | 0.23                      | Rain          | 21          | 0.12                      | Rain          |
|             | <b>)</b>                  |               | 12          | 0.25                      | Rain          | 22          | 0.24                      | Rain          |
| <b>Sep</b>  | <b>sum</b>                |               | 13          | 0.02                      | Rain          | 23          | T                         | Rain          |
| 1           | 0                         |               | 14          | 0                         |               | 24          | 0.34                      | Rain          |
| 2           | 0                         |               | 15          | 0                         |               | 25          | 0.32                      | Rain          |
| 3           | 0                         |               | 16          | 0.49                      | Rain          | 26          | 0.19                      | Rain          |
| 4           | 0                         |               | 17          | 0.28                      | Rain          | 27          | 0                         |               |
| 5           | 0                         |               |             |                           | Fog , Rain ,  | 28          | T                         | Rain          |
| 6           | 0                         |               | 18          | 0.08                      | Snow          | 29          | 1.09                      | Rain          |
| 7           | 0                         |               | 19          | 0                         |               | 30          | 0.14                      | Rain          |
| 8           | 0                         |               | 20          | 0                         | Fog           | 31          | 0.07                      | Rain          |
| 9           | 0                         | Fog           | 21          | 0.3                       | Rain          | <b>2012</b> | <b>Precip. (in</b>        | <b>Events</b> |
| 10          | 0                         | Fog           | 22          | 1.76                      | Rain          |             | <b>)</b>                  |               |
| 11          | 0                         |               | 23          | 0.55                      | Rain          | <b>Feb</b>  | <b>sum</b>                |               |
| 12          | 0                         |               | 24          | 0.26                      | Rain          | 1           | 0.53                      | Rain          |
| 13          | T                         |               | 25          | 0                         |               | 2           | 0                         |               |
| 14          | 0                         |               | 26          | 0.02                      | Rain          | 3           | 0                         |               |
| 15          | 0                         |               | 27          | 0.42                      | Rain          | 4           | 0                         |               |
| 16          | 0                         |               | 28          | T                         |               | 5           | 0                         |               |
| 17          | 0.2                       | Rain          | 29          | 0.09                      | Rain          | 6           | 0                         |               |
| 18          | 0.28                      | Rain          | 30          | 0                         |               | 7           | 0.01                      | Rain          |
| 19          | 0.01                      |               | <b>2011</b> | <b>Precip. (in</b>        | <b>Events</b> | 8           | 0.11                      | Rain          |
| 20          | 0                         | Fog           |             | <b>)</b>                  |               | 9           | 0.1                       | Rain          |
| 21          | T                         |               | <b>Dec</b>  | <b>sum</b>                |               | 10          | 0.1                       | Rain          |
| 22          | T                         | Rain          | 1           | T                         | Fog           | 11          | 0.03                      | Rain          |
| 23          | 0                         |               | 2           | 0.01                      | Rain          | 12          | 0.04                      | Rain          |
| 24          | T                         | Fog           | 3           | 0                         |               | 13          | 0.45                      | Rain          |
| 25          | 0.19                      | Rain          | 4           | 0                         |               | 14          | 0.1                       | Rain          |
| 26          | 0.59                      | Rain          | 5           | 0                         | Fog           | 15          | 0                         |               |
| 27          | 0.01                      | Rain          | 6           | 0                         | Fog           | 16          | 0.07                      | Fog , Rain    |
| 28          | 0                         |               | 7           | 0                         | Fog           | 17          | 0.68                      | Fog , Rain    |
| 29          | 0                         |               | 8           | 0                         |               | 18          | 0.25                      | Rain          |
| 30          | 0.01                      |               | 9           | 0                         | Fog           | 19          | 0                         |               |
| <b>2011</b> | <b>Precip. (in</b>        | <b>Events</b> | 10          | T                         | Rain          | 20          | 0.12                      | Rain          |
|             | <b>)</b>                  |               | 11          | 0.02                      | Fog , Rain    | 21          | 0.03                      | Rain          |
| <b>Oct</b>  | <b>sum</b>                |               | 12          | 0                         | Fog           | 22          | 0.34                      | Rain          |
| 1           | 0.02                      | Rain          | 13          | 0                         | Fog           | 23          | 0                         |               |
| 2           | 0.37                      | Rain          | 14          | T                         | Rain          | 24          | 0.45                      | Rain          |
| 3           | 0.1                       | Rain          | 15          | 0.03                      | Rain          | 25          | T                         | Rain          |
| 4           | 0.05                      | Rain          | 16          | 0                         |               | 26          | 0.05                      | Rain , Snow   |
| 5           | 0.09                      | Rain          | 17          | 0                         | Fog           | 27          | 0                         |               |
| 6           | 0.11                      | Rain          | 18          | 0.19                      | Rain          | 28          | 0.14                      | Rain , Snow   |
| 7           | 0.06                      | Rain          | 19          | 0                         | Fog           | 29          | 0.03                      | Rain , Snow   |
| 8           | 0.02                      | Fog , Rain    | 20          | T                         |               | <b>2012</b> | <b>Precip. (in</b>        | <b>Events</b> |
| 9           | 0.1                       | Rain          | 21          | 0                         |               |             | <b>)</b>                  |               |
| 10          | 0.25                      | Rain          | 22          | 0                         | Fog           | <b>Mar</b>  | <b>sum</b>                |               |
| 11          | 0.89                      | Rain          | 23          | 0.02                      | Rain          | 1           | T                         |               |

| Date        | Precipitation<br>(inches) | Event         | Date        | Precipitation<br>(inches) | Event         | Date        | Precipitation<br>(inches) | Event         |
|-------------|---------------------------|---------------|-------------|---------------------------|---------------|-------------|---------------------------|---------------|
| 2           | 0.08                      | Rain          | 13          | 0                         |               | 18          | 0                         |               |
| 3           | 0                         |               | 14          | 0                         |               | 19          | 0                         |               |
| 4           | T                         | Rain          | 15          | 0                         |               |             |                           | Rain ,        |
| 5           | 0.27                      | Rain          | 16          | 0                         |               |             |                           | Thunderstor   |
| 6           | 0.02                      | Snow          | 17          | T                         |               | 20          | 0.6                       | m             |
| 7           | 0                         |               | 18          | T                         |               | 21          | 0                         |               |
| 8           | 0                         |               | 19          | 0                         |               | 22          | 0.04                      | Rain          |
| 9           | 0.14                      | Fog , Rain    | 20          | 0.25                      | Rain          | 23          | T                         | Rain          |
| 10          | 0.41                      | Rain          | 21          | 0.55                      | Rain          | 24          | 0                         |               |
| 11          | 0.54                      | Rain          | 22          | 0.24                      | Rain          | 25          | 0                         |               |
| 12          | 0.76                      | Rain , Snow   | 23          | 0.01                      | Rain          | 26          | 0                         | Fog           |
|             |                           | Fog , Rain ,  | 24          | T                         |               | 27          | 0                         |               |
| 13          | 0.37                      | Snow          |             |                           | Rain ,        | 28          | T                         | Rain          |
| 14          | 0.34                      | Rain          |             |                           | Thunderstor   | 29          | 0                         |               |
| 15          | 0.94                      | Rain          | 25          | T                         | m             | 30          | 0                         |               |
| 16          | 0.33                      | Rain          | 26          | 0                         |               | 31          | 0                         |               |
|             |                           | Fog , Rain ,  | 27          | 0                         |               | <b>2012</b> | <b>Precip. (in</b>        | <b>Events</b> |
| 17          | 0.37                      | Snow          | 28          | T                         |               | <b>Aug</b>  | <b>sum</b>                |               |
| 18          | 0.14                      | Rain          | 29          | 0                         |               | 1           | 0                         |               |
| 19          | 0.08                      | Rain          | 30          | 0.01                      | Rain          | 2           | 0                         |               |
| 20          | 0.14                      | Rain          | 31          | 0.15                      | Rain          | 3           | 0                         |               |
| 21          | 0.05                      | Rain          | <b>2012</b> | <b>Precip. (in</b>        | <b>Events</b> | 4           | 0                         |               |
| 22          | 0.16                      | Rain          |             | <b>)</b>                  |               | 5           | 0                         |               |
| 23          | 0                         |               | <b>Jun</b>  | <b>sum</b>                |               | 6           | T                         |               |
| 24          | 0                         |               | 1           | 0.26                      | Rain          | 7           | 0                         |               |
| 25          | T                         |               | 2           | 0.01                      | Rain          | 8           | 0                         |               |
| 26          | T                         |               | 3           | 0                         |               | 9           | 0                         |               |
| 27          | 0.19                      | Rain          | 4           | 0.05                      | Rain          | 10          | 0                         |               |
| 28          | 0.05                      | Rain          | 5           | 0.63                      | Rain          | 11          | 0                         |               |
| 29          | 1.08                      | Rain          | 6           | 0                         |               | 12          | 0                         |               |
| 30          | 0.22                      | Rain          | 7           | 0.65                      | Rain          | 13          | 0                         |               |
| 31          | 0.52                      | Rain          | 8           | 0.06                      | Rain          | 14          | 0                         |               |
| <b>2012</b> | <b>Precip. (in</b>        | <b>Events</b> | 9           | T                         |               | 15          | 0                         |               |
| <b>Apr</b>  | <b>sum</b>                |               | 10          | 0                         |               | 16          | 0                         |               |
| 1           | 0.06                      | Rain          | 11          | T                         |               | 17          | 0                         |               |
| 2           | 0                         |               | 12          | 0.03                      | Rain          | 18          | 0                         |               |
| 3           | 0.06                      | Rain          | 13          | 0                         |               | 19          | 0                         |               |
| 4           | 0                         |               | 14          | 0                         |               | 20          | 0                         |               |
| 5           | 0.18                      | Rain          | 15          | 0                         |               | 21          | T                         |               |
| 6           | 0.01                      | Rain          | 16          | T                         | Rain          | 22          | 0                         |               |
| 7           | 0                         |               | 17          | 0                         |               | 23          | 0                         |               |
| 8           | 0                         |               | 18          | 0.12                      | Rain          | 24          | 0                         |               |
| 9           | 0                         |               | 19          | 0.04                      | Rain          | 25          | 0                         |               |
| 10          | T                         |               | 20          | 0                         |               | 26          | 0                         |               |
| 11          | 0.09                      | Rain          | 21          | 0                         |               | 27          | 0                         |               |
| 12          | 0.02                      | Rain          | 22          | 0.62                      | Rain          | 28          | 0                         |               |
| 13          | 0                         | Fog           | 23          | 0.34                      | Rain          | 29          | 0                         |               |
| 14          | 0                         |               | 24          | 0                         |               | 30          | 0                         |               |
| 15          | T                         |               | 25          | 0.02                      | Rain          | 31          | 0                         |               |
| 16          | 0.32                      | Fog , Rain    | 26          | T                         | Rain          | <b>2012</b> | <b>Precip. (in</b>        | <b>Events</b> |
| 17          | 0.07                      | Rain          | 27          | 0                         |               | <b>Sep</b>  | <b>sum</b>                |               |
| 18          | 0.07                      | Rain          | 28          | T                         | Rain          | 1           | 0                         |               |
| 19          | 0.43                      | Rain          | 29          | 0.01                      | Rain          | 2           | 0                         |               |
| 20          | 0.26                      | Rain          | 30          | 0.12                      | Rain          | 3           | 0                         |               |
| 21          | 0                         |               | <b>2012</b> | <b>Precip. (in</b>        | <b>Events</b> | 4           | 0                         |               |
| 22          | T                         |               |             | <b>)</b>                  |               | 5           | 0                         |               |
| 23          | 0                         |               | <b>Jul</b>  | <b>sum</b>                |               | 6           | 0                         |               |
| 24          | 0.17                      | Rain          | 1           | T                         |               | 7           | 0                         |               |
| 25          | 0.42                      | Rain          | 2           | 0.08                      | Rain          | 8           | 0                         |               |
| 26          | 0.15                      | Rain          | 3           | 0.23                      | Rain          | 9           | 0.01                      |               |
| 27          | 0.03                      | Rain          | 4           | 0                         |               | 10          | 0.01                      | Rain          |
| 28          | T                         |               | 5           | 0                         |               | 11          | 0                         |               |
| 29          | 0.17                      | Rain          | 6           | 0                         |               | 12          | 0                         |               |
| 30          | 0.17                      | Rain          | 7           | 0                         |               | 13          | 0                         |               |
| <b>2012</b> | <b>Precip. (in</b>        | <b>Events</b> | 8           | T                         |               | 14          | 0                         |               |
| <b>May</b>  | <b>sum</b>                |               |             |                           | Rain ,        | 15          | 0                         |               |
| 1           | 0.02                      | Rain          | 9           | 0.06                      | Thunderstor   | 16          | 0                         |               |
| 2           | 0.02                      |               | 10          | 0                         | m             | 17          | 0                         | Fog           |
| 3           | 0.73                      | Rain          | 11          | 0                         | Fog           | 18          | 0                         |               |
| 4           | 0.07                      | Rain          | 12          | 0                         | Fog           | 19          | 0                         | Fog           |
| 5           | 0                         |               |             |                           | Rain ,        | 20          | 0                         | Fog           |
| 6           | 0                         |               |             |                           | Thunderstor   | 21          | T                         |               |
| 7           | 0                         |               | 13          | 0.02                      | m             | 22          | 0.01                      | Rain          |
| 8           | 0                         |               |             |                           | Fog , Rain ,  | 23          | 0                         | Fog           |
| 9           | T                         | Rain          | 14          | T                         | Thunderstor   | 24          | 0                         |               |
| 10          | 0                         |               | 15          | T                         | m             | 25          | 0                         |               |
| 11          | 0                         |               | 16          | 0.01                      | Rain          | 26          | 0                         | Fog           |
| 12          | 0                         |               | 17          | 0                         |               | 27          | 0                         | Fog           |

| Date        | Precipitation<br>(inches) | Event         | Date        | Precipitation<br>(inches) | Event         | Date        | Precipitation<br>(inches) | Event         |
|-------------|---------------------------|---------------|-------------|---------------------------|---------------|-------------|---------------------------|---------------|
| 28          | T                         | Rain          | 8           | 0                         |               | 19          | 0                         |               |
| 29          | 0                         |               | 9           | 0.06                      | Fog , Rain    | 20          | 0.06                      | Rain          |
| 30          | 0                         |               | 10          | 0.02                      | Fog           | 21          | 0.02                      | Rain          |
| <b>2012</b> | <b>Precip. (in</b>        | <b>Events</b> | 11          | 0.12                      | Rain          | 22          | 0.37                      | Rain          |
| <b>Oct</b>  | <b>sum</b>                |               | 12          | 0.32                      | Rain          | 23          | 0.01                      | Rain          |
| 1           | 0                         |               | 13          | 0.09                      | Rain          | 24          | T                         | Rain          |
| 2           | 0                         |               | 14          | 0.31                      | Fog , Rain    | 25          | 0.09                      | Rain          |
| 3           | 0                         |               | 15          | 0.21                      | Rain          | 26          | 0.02                      | Rain          |
| 4           | 0                         |               | 16          | 0.89                      | Rain          | 27          | 0.18                      | Rain          |
| 5           | 0                         |               | 17          | 0.08                      | Rain          | 28          | 0.32                      | Rain          |
| 6           | 0                         |               | 18          | 0.13                      | Snow          | <b>2013</b> | <b>Precip. (in</b>        | <b>Events</b> |
| 7           | 0                         |               | 19          | 0.54                      | Rain , Snow   | <b>Mar</b>  | <b>sum</b>                |               |
| 8           | 0                         |               | 20          | 0.52                      | Rain          | 1           | 0.16                      | Rain          |
| 9           | 0                         |               | 21          | 0.07                      | Rain          | 2           | 0.03                      | Rain          |
| 10          | 0                         | Fog           | 22          | 0.13                      | Rain          | 3           | 0                         |               |
| 11          | 0                         | Fog           | 23          | 0.26                      | Rain          | 4           | 0                         |               |
| 12          | 0.08                      | Fog , Rain    | 24          | 0.01                      | Rain          | 5           | T                         | Rain          |
| 13          | 0.19                      | Rain          | 25          | 0.53                      | Rain , Snow   | 6           | 0.47                      | Rain          |
| 14          | 0.65                      | Rain          | 26          | 0.18                      | Rain          | 7           | 0.29                      | Fog , Rain    |
| 15          | 0.31                      | Rain          | 27          | 0.16                      | Rain          | 8           | 0                         | Fog           |
| 16          | 0                         |               | 28          | T                         | Rain          | 9           | 0                         | Fog           |
| 17          | 0                         |               | 29          | 0.06                      | Rain          | 10          | 0.03                      | Rain          |
| 18          | 0.82                      | Rain          | 30          | 0                         | Fog           | 11          | 0.05                      | Rain          |
| 19          | 0.19                      | Rain          | 31          | 0                         |               | 12          | 0.08                      | Rain          |
| 20          | 0.02                      | Rain          | <b>2013</b> | <b>Precip. (in</b>        | <b>Events</b> | 13          | 0.09                      | Rain          |
| 21          | 0.25                      | Rain          | <b>Jan</b>  | <b>sum</b>                |               | 14          | 0.11                      | Rain          |
| 22          | 0.35                      | Rain          | 1           | 0                         |               | 15          | T                         | Rain          |
| 23          | T                         | Rain          | 2           | 0                         |               | 16          | 0.17                      | Rain          |
| 24          | 0.28                      | Rain          | 3           | 0.16                      | Rain          | 17          | 0                         |               |
| 25          | 0                         |               | 4           | 0.1                       | Rain          | 18          | T                         |               |
| 26          | 0.06                      | Rain          | 5           | 0.12                      | Rain          | 19          | 0.46                      | Rain          |
| 27          | 0.91                      | Rain          | 6           | 0.08                      | Rain          | 20          | 0.39                      | Rain          |
| 28          | 0.24                      | Rain          | 7           | 0.09                      | Rain          | 21          | 0.32                      | Rain          |
| 29          | 0.43                      | Rain          | 8           | 0.64                      | Rain          | 22          | 0                         |               |
| 30          | 1.36                      | Rain          | 9           | 1.51                      | Rain          | 23          | 0                         |               |
| 31          | 0.57                      | Rain          | 10          | 0.01                      | Fog , Rain ,  | 24          | 0                         |               |
| <b>2012</b> | <b>Precip. (in</b>        | <b>Events</b> | 11          | 0                         | Snow          | 25          | 0                         |               |
| <b>Nov</b>  | <b>sum</b>                |               | 12          | 0                         | Fog           | 26          | 0                         |               |
| 1           | 0.38                      | Rain          | 13          | 0                         |               | 27          | 0.01                      | Rain          |
| 2           | 0.22                      | Rain          | 14          | 0                         |               | 28          | 0.08                      | Rain          |
| 3           | 0.02                      | Fog , Rain    | 15          | 0                         |               | 29          | T                         | Rain          |
| 4           | 0.32                      | Rain          | 16          | 0                         | Fog           | 30          | 0                         | Fog           |
| 5           | 0.03                      | Rain          | 17          | 0                         | Fog           | 31          | 0                         |               |
| 6           | 0.01                      | Fog , Rain    | 18          | 0                         | Fog           | <b>2013</b> | <b>Precip. (in</b>        | <b>Events</b> |
| 7           | T                         |               | 19          | 0                         | Fog           | <b>Apr</b>  | <b>sum</b>                |               |
| 8           | T                         | Fog           | 20          | 0                         | Fog           | 1           | 0                         |               |
| 9           | T                         | Fog           | 21          | 0                         | Fog           | 2           | 0                         |               |
| 10          | T                         |               | 22          | 0                         | Fog           | 3           | 0                         |               |
| 11          | 0.6                       | Rain , Snow   | 23          | 0.2                       | Rain          | 4           | 0.33                      | Rain          |
| 12          | 0.14                      | Rain          | 24          | 0.23                      | Rain          | 5           | 0.73                      | Rain          |
| 13          | 0.21                      | Rain          | 25          | 0.12                      | Rain          | 6           | 0.5                       | Rain          |
| 14          | 0.03                      | Rain          | 26          | 0.09                      | Rain          | 7           | 1.54                      | Rain          |
| 15          | 0                         | Fog           | 27          | 0.07                      | Rain          | 8           | 0.03                      | Rain          |
| 16          | 0.22                      | Fog , Rain    | 28          | 0.31                      | Rain          | 9           | T                         | Rain          |
| 17          | 0.24                      | Rain          | 29          | 0.17                      | Rain          | 10          | 0.37                      | Rain          |
| 18          | 0.31                      | Rain          | 30          | 0.14                      | Rain          | 11          | 0.06                      | Rain          |
| 19          | 2.13                      | Rain          | 31          | 0.12                      | Fog , Rain    | 12          | 0.38                      | Rain          |
| 20          | 0.15                      | Rain          | <b>2013</b> | <b>Precip. (in</b>        | <b>Events</b> | 13          | 0.37                      | Rain          |
| 21          | 0.44                      | Rain          | <b>Feb</b>  | <b>sum</b>                |               | 14          | 0.23                      | Rain          |
| 22          | T                         | Rain          | 1           | 0.01                      | Fog           | 15          | T                         | Rain          |
| 23          | 1.26                      | Rain          | 2           | 0                         | Fog           | 16          | 0.01                      | Rain          |
| 24          | T                         |               | 3           | 0.09                      | Fog , Rain    | 17          | 0                         |               |
| 25          | 0                         | Fog           | 4           | T                         | Rain          | 18          | 0.21                      | Rain          |
| 26          | 0                         |               | 5           | 0.13                      | Rain          | 19          | 0.81                      | Rain          |
| 27          | 0                         |               | 6           | 0.04                      | Rain          | 20          | T                         | Rain          |
| 28          | 0.11                      | Rain          | 7           | 0.05                      | Rain          | 21          | 0.13                      | Rain          |
| 29          | 0.06                      | Rain          | 8           | 0                         |               | 22          | 0                         |               |
| 30          | 1.4                       | Rain          | 9           | 0.01                      | Rain          | 23          | 0                         |               |
| <b>2012</b> | <b>Precip. (in</b>        | <b>Events</b> | 10          | 0                         | Fog           | 24          | 0                         |               |
| <b>Dec</b>  | <b>sum</b>                |               | 11          | 0.01                      | Rain          | 25          | 0                         |               |
| 1           | 0.16                      | Rain          | 12          | 0.04                      | Rain          | 26          | 0                         |               |
| 2           | 0.77                      | Rain          | 13          | 0.09                      | Rain          | 27          | T                         | Rain          |
| 3           | 0.51                      | Rain          | 14          | 0.04                      | Rain          | 28          | 0.04                      | Rain          |
| 4           | 0.56                      | Rain          | 15          | 0                         | Fog           | 29          | 0.15                      | Rain          |
| 5           | 0.06                      | Rain          | 16          | T                         | Fog , Rain    | 30          | T                         |               |
| 6           | 0.06                      | Rain          | 17          | T                         | Rain          | <b>2013</b> | <b>Precip. (in</b>        | <b>Events</b> |
| 7           | 0.04                      | Rain          | 18          | T                         | Rain          | <b>May</b>  | <b>sum</b>                |               |



| Date        | Precipitation<br>(inches) | Event         | Date        | Precipitation<br>(inches) | Event         | Date | Precipitation<br>(inches) | Event |
|-------------|---------------------------|---------------|-------------|---------------------------|---------------|------|---------------------------|-------|
| 21          | 0                         |               | <b>Feb</b>  | <b>sum</b>                |               |      |                           |       |
| 22          | 0                         |               | 1           | 0.08                      | Fog , Rain    |      |                           |       |
| 23          | 0                         |               | 2           | 0                         | Fog           |      |                           |       |
| 24          | 0                         |               | 3           | 0                         |               |      |                           |       |
| 25          | 0                         | Fog           | 4           | 0                         |               |      |                           |       |
| 26          | T                         | Fog , Rain    | 5           | 0                         |               |      |                           |       |
| 27          | 0                         |               | 6           | T                         | Snow          |      |                           |       |
| 28          | 0                         | Fog           | 7           | T                         |               |      |                           |       |
| 29          | 0.02                      | Rain          | 8           | 0.2                       | Fog , Snow    |      |                           |       |
| 30          | 0.09                      | Rain          | 9           | 0.02                      | Snow          |      |                           |       |
| <b>2013</b> | <b>Precip. (in</b>        | <b>Events</b> | 10          | 0.72                      | Rain          |      |                           |       |
|             | <b>)</b>                  |               | 11          | 0.67                      | Rain          |      |                           |       |
| <b>Dec</b>  | <b>sum</b>                |               | 12          | 0.18                      | Rain          |      |                           |       |
| 1           | 0.12                      | Rain          | 13          | 0.07                      | Rain          |      |                           |       |
| 2           | 0.18                      | Rain , Snow   | 14          | 0.37                      | Rain          |      |                           |       |
| 3           | 0                         |               | 15          | 0.46                      | Rain          |      |                           |       |
| 4           | 0                         |               | 16          | 1.04                      | Rain          |      |                           |       |
| 5           | 0                         |               | 17          | 0.57                      | Rain          |      |                           |       |
| 6           | 0                         |               | 18          | 0.6                       | Rain          |      |                           |       |
| 7           | 0                         |               | 19          | 0.04                      | Rain          |      |                           |       |
| 8           | 0                         |               | 20          | 0.12                      | Rain          |      |                           |       |
| 9           | 0                         |               | 21          | 0.11                      | Rain          |      |                           |       |
| 10          | 0                         |               | 22          | 0.1                       | Rain , Snow   |      |                           |       |
| 11          | 0                         | Fog           | 23          | 0.24                      | Rain          |      |                           |       |
| 12          | 0.27                      | Fog , Rain    | 24          | 0.51                      | Rain          |      |                           |       |
| 13          | 0.02                      | Rain          | 25          | 0.01                      |               |      |                           |       |
| 14          | T                         |               | 26          | 0                         |               |      |                           |       |
| 15          | 0.05                      | Fog , Rain    | 27          | 0                         |               |      |                           |       |
| 16          | 0.01                      | Fog , Rain    | 28          | 0                         |               |      |                           |       |
| 17          | 0                         | Fog           | <b>2014</b> | <b>Precip. (in</b>        | <b>Events</b> |      |                           |       |
| 18          | 0.05                      | Rain          |             | <b>)</b>                  |               |      |                           |       |
| 19          | 0                         |               | <b>Mar</b>  | <b>sum</b>                |               |      |                           |       |
| 20          | 0.22                      | Rain , Snow   | 1           | 0.02                      | Rain , Snow   |      |                           |       |
| 21          | 0.22                      | Rain          | 2           | 0.75                      | Rain          |      |                           |       |
| 22          | 0.42                      | Rain          | 3           | 0.42                      | Rain          |      |                           |       |
| 23          | 0.06                      | Rain          | 4           | 0.65                      | Rain          |      |                           |       |
| 24          | 0                         |               | 5           | 1.84                      | Rain          |      |                           |       |
| 25          | 0                         | Fog           | 6           | 0.12                      | Rain          |      |                           |       |
| 26          | 0                         | Fog           | 7           | 0                         |               |      |                           |       |
| 27          | 0.01                      | Fog , Rain    | 8           | 1.27                      | Rain          |      |                           |       |
| 28          | 0                         | Fog           | 9           | 0.17                      | Rain          |      |                           |       |
| 29          | 0                         | Fog           | 10          | 0.74                      | Rain          |      |                           |       |
| 30          | 0.01                      | Fog , Rain    | 11          | 0                         | Fog           |      |                           |       |
| 31          | 0.02                      | Fog , Rain    | 12          | 0                         | Fog           |      |                           |       |
| <b>2014</b> | <b>Precip. (in</b>        | <b>Events</b> | 13          | 0                         | Rain          |      |                           |       |
|             | <b>)</b>                  |               | 14          | 0.27                      | Rain          |      |                           |       |
| <b>Jan</b>  | <b>sum</b>                |               | 15          | 0.32                      | Rain          |      |                           |       |
| 1           | T                         | Fog , Rain    | 16          | 1.09                      | Rain          |      |                           |       |
| 2           | 0.16                      | Rain          | 17          | 0.01                      | Rain          |      |                           |       |
| 3           | 0.06                      | Rain          | 18          | T                         | Rain          |      |                           |       |
| 4           | 0                         | Fog           | 19          | 0.02                      | Rain          |      |                           |       |
| 5           | 0                         | Fog           | 20          | 0                         |               |      |                           |       |
| 6           | 0.01                      | Rain          | 21          | 0                         |               |      |                           |       |
| 7           | 0.48                      | Fog , Rain    | 22          | 0                         |               |      |                           |       |
| 8           | 0.38                      | Rain          | 23          | 0                         |               |      |                           |       |
| 9           | 0.23                      | Rain          | 24          | 0                         |               |      |                           |       |
| 10          | 0.17                      | Rain          | 25          | 0.16                      | Rain          |      |                           |       |
| 11          | 0.84                      | Rain          | 26          | 0.14                      | Rain          |      |                           |       |
| 12          | 0.06                      | Rain          | 27          | 0.01                      |               |      |                           |       |
| 13          | 0                         |               | 28          | 0.87                      | Rain          |      |                           |       |
| 14          | T                         | Fog , Rain    | 29          | 0.55                      | Rain          |      |                           |       |
| 15          | 0                         | Fog           | 30          | 0                         |               |      |                           |       |
| 16          | 0                         | Fog           | 31          | 0                         |               |      |                           |       |
| 17          | 0                         | Fog           | <b>2014</b> | <b>Precip. (in</b>        | <b>Events</b> |      |                           |       |
| 18          | 0                         | Fog           |             | <b>)</b>                  |               |      |                           |       |
| 19          | 0                         | Fog           | <b>Apr</b>  | <b>sum</b>                |               |      |                           |       |
| 20          | 0                         |               | 1           | 0                         |               |      |                           |       |
| 21          | 0                         | Fog           |             |                           |               |      |                           |       |
| 22          | 0.02                      | Rain          |             |                           |               |      |                           |       |
| 23          | 0                         |               |             |                           |               |      |                           |       |
| 24          | 0                         | Fog           |             |                           |               |      |                           |       |
| 25          | 0                         | Fog           |             |                           |               |      |                           |       |
| 26          | 0                         | Fog           |             |                           |               |      |                           |       |
| 27          | 0                         | Fog           |             |                           |               |      |                           |       |
| 28          | 0.35                      | Rain          |             |                           |               |      |                           |       |
| 29          | 0.85                      | Rain          |             |                           |               |      |                           |       |
| 30          | 0                         |               |             |                           |               |      |                           |       |
| 31          | 0.09                      | Rain          |             |                           |               |      |                           |       |
| <b>2014</b> | <b>Precip. (in</b>        | <b>Events</b> |             |                           |               |      |                           |       |
|             | <b>)</b>                  |               |             |                           |               |      |                           |       |